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Crossroads of Development: Considering Gullah Geechee Communities as Traditional Cultural Properties

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CROSSROADS OF DEVELOPMENT: CONSIDERING GULLAH GEECHEE COMMUNITIES AS TRADITIONAL CULTURAL PROPERTIES

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ABSTRACT

Though Gullah Geechee heritage has been recognized by the National Park Service as traditional cultural property (TCP), no known Gullah Geechee property on the National Register of Historic Places (NRHP) is listed as a TCP. TCPs are properties eligible for NRHP inclusion that are associated with the history and continuation of a traditional culture. This thesis aims to bridge that disconnect by exploring how Gullah Geechee communities could be considered as TCPs through the context of two case studies. The Gullah Geechee culture may be briefly defined as a distinct African American culture descended from Africans enslaved on plantations along the Atlantic coasts of Florida, Georgia, and North and South Carolina, and is known for its own language, food, arts, and cultural values of community, spirituality, and self-sufficiency.

Because there is no official database or searchable list of TCPs available, this thesis creates a running list of known TCP listings on the NRHP including name, location, and the traditional culture associated with the listing. Findings from this research conclude there are 57 listed TCPs out of over 96,000 NRHP listings, a total of 0.06%. An exploration of how to utilize the TCP concept in the eligibility and listing process proceeds with case-study analysis of two Gullah Geechee communities. One is Stoney Community in Hilton Head, SC and the other is Phillips Community in Mount Pleasant, SC. At the time of this thesis, both communities were expressing concerns and opposition to U.S. highway expansion in their communities and were seeking the designation of eligible for nomination to the NRHP.

In communities facing loss of certain physical integrity from highway infrastructure, approaching Gullah Geechee communities with a TCP approach may affect NRHP eligibility. Using interviews with community members conducted for the Highway 278 project in the Stoney Community, significance and integrity are defined from the community perspective, then applied to the NRHP using TCP concepts. This thesis examines the two case studies as traditional cultural properties using both a community-based approach to significance and integrity while recognizing and applying the policy requirements of the NRHP and Bulletin 38. The thesis questions how the TCP framework for community-based definitions of significance and integrity may affect the NRHP eligibility of Gullah Geechee communities.

DEDICATION

To my Grandma, Boots Neufeld, and to my Granny, Becky Parry.

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I first want to acknowledge and thank the community members from Stoney Community in Hilton Head, and Phillips in Mount Pleasant, especially Mr. Richard Habersham, for allowing me the opportunity to study their communities, their thoughts, and answer my questions. I would like to extend my gratitude to my committee chair, Dr. Jon Marcoux, for his patience, guidance, and support throughout this process. Thank you to my committee members, Katherine Pemberton, Barry Stiefel, and Heather Hodges for making this thesis possible. I am also thankful to everyone who fielded my requests for information, insight, and advice: Will Cook, Velma Fann and Mary Beth Reed at New South Associates, Harriet Richardson Seacat at HDR, Paul Lusignan, Ralph Muldrow and Dr. Grant Gilmore for providing resources, Coastal Conservation League, and Thomas King.

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CHAPTER ONE

INTRODUCTION

Gullah Geechee communities and cultural resources in the South Carolina Lowcountry face an ever-changing landscape as new neighborhoods, new resorts, and highway expansions endanger the future of their communities. Gullah Geechee communities repeatedly affected by development projects raise the same concerns year after year during various highway projects. In the South Carolina Lowcountry, there are no less than five historic African American communities currently threatened by highway expansion projects. [1] In the immediate future, community members are worried the expansions will increase traffic and threaten to reduce their property lines or homes.

The Gullah Geechee people are the descendants of Africans, particularly West Africans, who were enslaved on plantations in the American South in the Lowcountry, coastal areas, and sea islands of North Carolina, South Carolina, Georgia, and Florida. The Gullah Geechee people are distinct among African American peoples through their unique language and traditions. Living in relative isolation during enslavement and later in small communities following emancipation, the distinct Gullah Geechee culture passed down through generations and continue in the traditions today. Aspects of Gullah Geechee culture include but are not limited to the unique Gullah Geechee language, arts, crafts, cuisine, and cultural values like community connection, resistance and activism,

[1] Adam Parker, "5 road projects threaten long-established Black communities across the Lowcountry," *The Post and Courier*, last updated April 2021, https://www.postandcourier.com/news/5-road-projects-threaten-long-established-black-communities-across-the-lowcountry/article_e15f018c-6bc4-11eb-89e0-07732c612db9.html.

and connection to land and water. Family and the relationships between community embers is a vital characteristic of Gullah Geechee culture, and it is maintained in part through the land and the transference of property from one generation to another. [2]

Most land in Gullah Geechee communities was passed down through the process of heirs' property, meaning the property was passed down to the future generations without legal documentation. Families must then obtain approval from all persons who own a stake in the land in order to acquire mortgages or loans on the property. Developers have unfortunately taken advantage of the absence of documentation by offering payments to some family members in order to evict those that live on the land. [3] In addition to the direct threat to the property ownership, the development also stimulates more development, leading to a cascading issue of increasing property value and property taxes. From the long-term perspective, some residents are concerned about possible gentrification; with increased traffic and development, there is a correlation with an increase in wealthier homeowners moving to the area. [4] Widening a highway can not only change the individual property lines, it can change the ways people move around the neighborhood. A wider and busier highway can make it more difficult for residents to go to each other's homes, harming the familial relationships integral to the community. Losing the ability to own and live off of the property purchased by the community's ancestors for future generations would threaten some of the primary aspects of Gullah

[2] "Management Plan," Gullah Geechee Cultural Heritage Corridor, National Park Service, US Department of the Interior, 5-9.
[3] Albert George, "FEMA: Don't drive the Gullah-Geechee from their land," *The Hill*, 2021, https://thehill.com/opinion/civil-rights/548809-fema-dont-drive-the-gullah-geechee-from-their-land?rl=1.
[4] Adam Parker, "5 road projects threaten long-established Black communities across the Lowcountry," *Post and Courier.*

Geechee culture. Emory Campbell, a member of Stoney Community made the connection plainly to the local newspaper the *Island Packet*, "One of the reasons we have culture is because we have land. Unless we can preserve the land of the families, we will not have any culture." [5]

At the time of writing and publishing this thesis, two such communities in the Lowcountry stand at a crossroads with new development in the form of highway expansion. One community is Phillips Community in Mount Pleasant, SC that will face significant change should the South Carolina Department of Transportation plan to expand Highway 41 deeper into the community. [6] Another community is Stoney Community in Hilton Head, which will also face significant change should U.S. Highway 278 be expanded. [7] Both of these communities were cut through in the 20th century when the highways were constructed, changing the overall landscape of the neighborhoods. The consequences of these transportation programs also affect the future of communities' preservation. Historic preservation can play an important role in providing recognition and some protections to historic resources through the National Register of Historic Places, especially when projects like highway expansions threaten to harm them.

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[5] Quote from Emory Campbell from "'We're not going to let it fail:' 5 ways Hilton Head has to preserve Gullah culture" by Katherine Kokal, *The Island Packet*, April 2019. https://www.islandpacket.com/article228725519.html

[6] Slade, David, "Charleston County decides on 5-lane Highway 41 through historic Phillips community." The Post and Courier. Last modified August 14, 2020. https://www.postandcourier.com/news/charleston-county-decides-on-5-lane-highway-41-through-historic-Phillips-community/article_aea6a1c4-db68-11ea-97d4-77ead4d74f08.html#:~:text=Charleston%20County%20scraps%20plan%20to,road%20through%20Mount%20Pleasant%20subdivisions&text=County%20officials%20said%20that%20no,the%20highway%20will%20lose%20property.

[7] Kokal, Katherine, "Meet the Gullah community that could be lost if the Hilton Head bridges get more lanes." Last modified May 3, 2019. https://www.islandpacket.com/news/local/article229839489.html

The National Register of Historic Places (NRHP) was established in 1966 through the National Historic Preservation Act and operates through the National Park Service. The NRHP is a program that recognizes properties important to U.S. history on the local, state, and/or national scale, and promotes their preservation. That property must be a building, structure, site, district, or object, and be able to communicate its significance and integrity through the NRHP set of criteria. Significance refers to the property's historical association or potential to yield information important to history, and integrity refers to the property's ability to communicate that history. [8] As of early 2021, there are over 96,000 properties listed on the NRHP. Though the NRHP cannot guarantee the preservation of a property, the policy can provide certain considerations to protect the property, especially if the potential threat is a federally-funded project.

Though a place must still conform to the categories of the NRHP nomination process, the NRHP does allow eligible properties to contextualize and broaden the interpretation of the criteria through traditional cultural properties or TCPs. The 1980 amendments to the NHPA included goals to study ways to preserve and conserve elements of intangible culture, which eventually led the conversation to the creation of Bulletin 38. TCPs were created in 1990 through the National Park Service (NPS) National Register Bulletin 38 to broaden the lens of what is eligible on the NRHP. In Bulletin 38, TCPs are defined as NRHP eligible properties associated with the cultural

[8] A more detailed explanation of the National Register of Historic Places and the criteria for nominating a property is in Chapter 2.

practices or beliefs of a living community that are rooted in the history of the community and are important to maintaining community identity. [9]

As many preservationists recognize, transportation related projects often receive federal funding and therefore trigger the review of Section 106 of the 1966 National Historic Preservation Act (NHPA) which requires any project with federal funding to consider the effects of the undertaking on historic resources and to either avoid, minimize, or mitigate any harm to those resources. The National Environmental Policy Act also requires any federal agencies to consider cultural resources and the impact a project may have on those communities who share in those cultural resources. The federal Department of Transportation also contains section 4(f) which similarly requires all possible planning to avoid harm to historic resources in its projects. [10]

Increasing the number of listings or potentially eligible properties through the NRHP could be an avenue for more validation, visibility, and potentially protections for many Gullah Geechee places. Though Gullah Geechee heritage has been recognized by the NPS through the Gullah Geechee Cultural Heritage Corridor (GGCHC), Gullah Geechee heritage is not necessarily well-represented through individual listings on the NRHP. Even more broadly, prior to 2014 less than 8% of properties on the NRHP are associated with African American, Latino, Asian American, Native American or other minority communities. [11] Calls to expand the NRHP and its approaches to create a more

[9] Patricia L. Parker, and Thomas F. King. 1990. Guidelines for Evaluating and Documenting Traditional Cultural Properties. National Register Bulletin 38. Washington, D.C.: National Park Service.
[10] Federal Transportation Policy, National Trust for Historic Preservation, https://forum.savingplaces.org/learn/fundamentals/preservation-law/federal/section-4f/transportation.
[11] The Federal Role in Historic Preservation: An Overview, Congressional Research Service, updated April 7, 2020, 27.

inclusive and diverse history have echoed in the preservation field for years, but those conversations are not necessarily reflected in the present reality of the NRHP. [12] Many significant sites that are associated with some minority groups have experienced changes in their physical integrity, therefore affecting the potential NRHP eligibility. [13] A lack of physical integrity is one of the main criteria that affects the eligibility of many Gullah Geechee communities and cultural resources seeking a route to the NRHP.

Cultural resources can have a broad category of different including but not limited to archeological sites, historic structures and buildings, cultural landscapes, objects, natural features, or sites that are significant to a group of people. The term cultural resource is not defined in law and is therefore generally accommodating to those resources that are considered culturally important. However, for the context of not only this thesis but in the context of the legally defined NRHP, the cultural resources in question must fall under the categories of building, structure, site, district, or object.

That evaluative criteria that emphasize the physical integrity of a property are sometimes jeopardized in Gullah Geechee communities whose physical resources have been affected by the highway construction through their neighborhoods. The losses and potential for more loss that Stoney and Phillips communities face exist in a larger trend that affects Gullah Geechee communities whose physical communities have existed since the 1870's and culturally existed for much longer. TCPs could then be a route for applying the NRHP to Gullah Geechee communities, especially those like Stoney

[12] Ned Kaufman, "Historic Places and the Diversity Deficit in Heritage Conservation," *CRM: The Journal of Heritage Stewardship*, 2004.
[13] Sara Bronin, "Op-Ed: How to fix a National Register of Historic Places that reflects mostly white history," *Los Angeles Times*, Dec 15 2020. https://www.latimes.com/opinion/story/2020-12-15/historic-preservation-chicano-moratorium-national-register

Community and Phillips that have experienced some loss in the physical fabric of their communities from the 20th century highway construction.

The Charleston County Historic Resources Update written by New South Associates in 2016 for Charleston County details the variety of historically significant places and structures in the county. In the report, New South Associates state that in 2009, they recommended the sweet grass basket corridor in Mount Pleasant along Highway 41 be listed on the NRHP as a TCP. [14] Though the state historic preservation office (SHPO) offered to move forward with the nomination process with the community's support, Phillips Community has not been listed on the NRHP. At the time of publication in 2021, the community is seeking a nomination as a historic district and not framing the district as a TCP, though it has been determined eligible as one. On the other hand, Stoney Community in Hilton Head has tried to enlist aid in creating a nomination for the community as a TCP, but some initial surveys have not recommended it pursue that option as proposed. At the time of publication in 2021, neither of these communities has successfully been listed on the NRHP as a TCP but both have considered nominations in different ways.

The NPS Heritage Documentation Project has a program to map out as many Gullah Geechee cultural resources in the national corridor as possible, called the Gullah Geechee Cultural Resources Mapping Project. The NPS website explains the overall project and has a full page explaining the importance of mapping out the Gullah Geechee cultural resources. Though not within the context of the NRHP, this page still refers to

[14] New South Associates, "Charleston County Historic Resources Survey Update," Charleston County Zoning and Planning Department, Charleston County, South Carolina, 2016, 7.

the cultural resources explicitly as "traditional cultural properties." [15] Rather than using language like "significant structures or landscapes or communities," this webpage owned by the Department of the Interior plainly refers to Gullah Geechee resources as TCPs. Clearly there is a disconnect between the intentioned reference to Gullah Geechee resources as TCPs and the formally recognized TCP designations on the NRHP, because at present there are no Gullah Geechee TCPs listed on the NRHP.

Given the cultural resources currently threatened by encroaching development projects and particularly highway expansion in the Lowcountry, it is important to ask if those cultural resources are being considered, taking into account the historic context influencing these decisions. This thesis provides an overview of the relatively underutilized TCP approach, applies the TCP concept to two Gullah Geechee communities threatened by highway expansion, and ultimately questions how the TCP framework for community-based definitions of significance and integrity can affect the NRHP eligibility of Gullah Geechee communities. The literature review in chapter 2 outlines and contextualizes the parameters and the discourse surrounding TCPs, as well as set the background for the historically discriminatory relationship between transportation and urban planning with respect to Black neighborhoods. Chapter 3 then details the methods employed in this thesis to survey the scope of TCPs and analyze the case studies with respect to TCPs. Chapter 4 creates a list of known TCPs and contextualizes their current scope on the NRHP. Chapter 5 analyzes interview data from

[15] "Gullah/Geechee Cultural Resource Mapping Project," Heritage Documentation Programs, National Park Service, Department of the Interior.

community members in Stoney and Phillips in order to distill definitions of significance and integrity from the perspective of the community members, and then applies those definitions to the NRHP's TCP standards. Chapter 5 then positions the two neighborhoods and their definitions of significance and integrity to the NRHP as TCPs, and asks how historic preservationists might more effectively view the communities and their cultural resources. The thesis questions how the TCP community-based approach may affect the significance and integrity of Gullah Geechee resources through the NRHP criteria, and concludes with thoughts and recommendations for preservationists to found TCP considerations on community perspectives.

CHAPTER TWO

LITERATURE REVIEW

The case studies of Phillips and Stoney, communities that are currently threatened by highway projects, do not exist in a vacuum, but rather are influenced by broader historical patterns of racial discrimination in transportation policy and implementation. This literature review investigates the history and push for transportation infrastructure and the reality of the discriminatory practices. Because many transportation projects are federally funded, the NHPA and NEPA are triggered to instigate protection or mitigation practices for threatened historic resources. Much of the literature surrounding that process criticizes its limitations and the ways in which the application of the NRHP has not served Black communities and their resources. Following is an exploration of TCPs and how they could alleviate some of the issues and criticisms with the application of the NHPA.

Transportation

The history and creation of the American highway system can be attributed to the Good Roads Movement, which sought to create support for increased transportation infrastructure began in the late 19th century. Part of the movement's efforts were to convince mostly rural communities that roads and highways would help encourage economic growth, allowing people to travel on the otherwise muddy or dusty roads that inhibited both speed and safety. The American Federal Highway Administration wrote about the movement in the late 1970's from a largely public service perspective,

encouraging the benefits the infrastructure would have from creating jobs, connecting communities, and allowing people the choice to move freely between towns and cities. [16]

The general public opinion that highways and increased transportation infrastructure can be attributed to the Movement and its arguments that highways were almost entirely beneficial to any community. Similarly, the cultural reset that figures like Robert Moses created in more urban environments had an equally enduring impact on communities and their relationships to transportation. Though not universal, many scholars and many public opinions concede that the negative effects of reurbanism have been great indeed, and impacted certain minority communities, especially in New York, in ways that still influence them today. [17] It was not until 1970 in which the National Environmental Policy Act created policy that forced planning to consider its impact on communities and their resources, meaning any highway with federal dollars created prior to the Act was not forced to review its potential effects on a neighborhood. In other words, there was no policy requiring planning departments, and in this case South Carolina planning departments, to consider the effects of highway construction through historically Black communities.

The reality that not only transportation, but highway design and planning have disproportionately affected African American communities in the U.S. has been studied, analyzed, and described in various publications. In other southern states and cities, the intersection of transportation infrastructure and racial disparities has been very publicly

[16] "America's Highways, 1776-1976: A History of The Federal Aid Program." United States Department of Transportation, Federal Highway Administration. http://archive.org/stream/americashighways00unit#page/n3/mode/2up.
[17] Powell, Michael. "A Tale of Two Cities." *The New York Times.* May 2007. https://www.nytimes.com/2007/05/06/nyregion/thecity/06hist.html.

explored. In January 2021, President Biden released a memorandum recognizing the role housing and transportation policies disproportionately harmed Black neighborhoods in the 20th century. In addition to housing, he acknowledged the Interstate Highway System often created interstate highways deliberately through Black neighborhoods, often destroying houses. He wrote, "The Federal Government must recognize and acknowledge its role in systematically declining to invest in communities of color…The effects of these policy decisions continue to be felt today, as racial inequality still permeates land-use patterns in most U.S. cities and virtually all aspects of housing markets." [18]

The racialized history of transportation is explored at length by different scholars. Both the historical and modern fights for expanded public transportation are inextricably linked with the fight for civil rights. One of the targets in the Civil Rights Movement was the fight to desegregate public transportation through campaigns like the Montgomery Bus Boycott, which lasted from December 5, 1955 to December 20, 1956, or the Freedom Riders, who rode in segregated interstate buses. In the fight to desegregate public transportation, some scholars like Rebecca Retzlaff show how interstates and highways enforced segregation in Montgomery before the Civil Rights Movement in addition to the aftermath of the boycott. The Montgomery planners initially took advantage of the highway system to combat the boycott, then used the highway infrastructure to retaliate against the boycott. [19]

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[18] President Joseph Biden, Jan. 26, 2021, "Memorandum on Redressing Our Nation's and the Federal Government's History of Discriminatory Housing Practices and Policies," The White House.
[19] Rebecca Retzlaff,. "The Montgomery Bus Boycott and the Racial Basis for Interstate Highways and Urban Renewal." *Journal of Urban History*, (May 2020).https://doi.org/10.1177/0096144220917470. For more information on the freedom riders, see Raymond Arsenault's *Freedom Riders 1961 and the Struggle for Racial Justice* New York: Oxford University Press, 2006.

The location and placement of highways can significantly alter the fabric of a neighborhood, and that placement can result in the highway bringing new people into the area, or it can create spatial separation within a neighborhood. David Karas argues the priority of planners is represented in highway locations, with little attention paid to where highways were installed in both poor and minority neighborhoods. [20] While the interstate was to create a direct and fast connection between one place to another, many policymakers and city planners on the local level purposely planned routes through poor and/or minority neighborhoods. The decision to route construction through majority non-white communities reinforced preexisting racial segregation and created significant losses to the homes and existences of those communities. Federal interstate and highway construction damaged or destroyed an estimated 330,000 urban housing units between 1957 and 1968 and dislocated an estimated 32,400 households each of those years. [21] Some estimates from Robert Moses's legacy in New York City place the number of people displaced for his highways at 250,000, and many African American families and neighborhoods were among those displaced. His highway systems in the city created a path for people living in the suburbs to drive into the city while neglecting communities that have been cut through. [22]

Like in New York City, the same lack of consideration and sometimes blatant choice to run highways through Black neighborhoods is also found in the infrastructure

[20] David Karas, "Highway to Inequity: The Disparate Impact of the Interstate Highway System on Poor and Minority Communities in American Cities," *New Visions for Public Affairs*, Vol. 7, April 2015.
[21] Raymond Mohl, "Planned Destruction: The Interstates and Central City Housing," in *From Tenements to the Taylor Homes: In Search of an Urban Housing Policy in Twentieth-Century America*, 226-45. doi:10.5325/j.ctv14gpbjz.19.
[22] Omar Freilla, "Burying Robert Moses's Legacy in New York City," in *Highway Robbery*, 2004, 75-78.

of other cities. Planning highways through Black communities was so commonplace that it has its own phrase amongst some critics: "white roads through black bedrooms." [23] Similarly, in Washington D.C., the rallying cry opposing the highway construction was "no white men's roads through Black men's homes." [24] In Birmingham, Alabama, for example, not only were 60 blocks in a mostly Black neighborhood torn down for the city's highway, the highway boundaries can be traced to their racial zoning regulations from 1926 that purposefully separated communities. [25] Pioneering scholars like Robert Bullard have established this history throughout his many works. Known as the father of environmental justice, Bullard has written about the relationships between race, racism, and transportation infrastructure at the federal, state, and local level. Discrimination in highway infrastructure affects the land use, property use, environmental impacts, and the allocation of funds and facilities. [26] Cities like Atlanta have been the topic of discussion about racial discrimination against the backdrop of highway and rail infrastructure. The urban sprawl in Atlanta connects the city by road but disconnects the city in the same way; the highways act as boundaries between neighborhoods, making them almost impossible to cross without driving on them. [27]

Though the highway cases in rural communities like Phillips and Stoney have not been explored in the academic space as cities have, the overarching impact of racial

[23] Johnny Miller, "Roads to nowhere: how infrastructure built on American inequality," 2018, *The Guardian,* https://www.theguardian.com/cities/2018/feb/21/roads-nowhere-infrastructure-american-inequality.
[24] Noel King, "A Brief History of How Racism Shaped Interstate Highways," *NPR*, 2021. https://www.npr.org/2021/04/07/984784455/a-brief-history-of-how-racism-shaped-interstate-highways
[25] David Karas, "Highway to Inequity," April 2015.
[26] *Highway Robbery, Transportation Racism and New Routes to Equity* (2004), edited by Robert D. Bullard, Glenn S. Johnson, and Angel O. Torres, 15-21.
[27] Robert D Bullard, Glenn S Johnson, and Angel O Torres, *Sprawl City: Race, Politics, and Planning in Atlanta*, Washington, D.C.: Island Press, 2000.

discrimination in the planning process for their respective highways cannot be overlooked. Another urban example exists within the city of Charleston. The generally accepted narrative surrounding the construction of the crosstown, called the Septima P Clark parkway, displaced a great many Black Charlestonians and destroyed a predominantly Black neighborhood within the city. According to one *Post and Courier* article, the highway construction destroyed about 150 homes, and it now has an associated history of displacing Black Charlestonians. This history is widely accepted in the vernacular history of Charleston, being discussed in no less than three articles from the local newspaper during 2020.

In those same articles, the history of the Charleston crosstown was discussed in order to plea the community to prevent a similar situation in Phillips Community in Mount Pleasant, SC. [28] Additionally a 2016 article in the Charleston based newspaper stated the crosstown "reflected the convergence of two national trends, institutionalized discrimination and the investment of billions of public dollars in high-speed freeways." [29] While no claims are made about any forethought in the planning process that displacement would occur, the accepted consequence is one of displacement. As Bullard has argued, "communities of color have the wrong complexion for protection." Planners historically neglected the minority communities in highway planning; when minority

[28] Parker, Adam. "Why highways were designed to run through Black communities: SC faces historical dilemma again." *Post and Courier.* Updated Nov. 23, 2020;
[29] Beach, Dana and William Saunders. "Reverse divisive legacy of the Charleston Crosstown." *Post and Courier*. 2016, last updated Sept. 14, 2020.

communities were not represented in the planning process, they were not given consideration in how the infrastructure was constructed. [30]

The NRHP and TCPs

The National Register of Historic Places

The federal government established preservation as policy with the passing of the Antiquities Act of 1906, which granted the President of the United States the authority to create national monuments of historic, cultural, or scientific importance. [31] The Historic Sites Act of 1935 declared it was a national policy to preserve historic buildings, sites, and objects for the public good and public use. [32] The more recent policy and one that pertains to the topic of this thesis was the National Historic Preservation Act of 1966, or NHPA, which created a program for officially recognizing historic properties important to the U.S. That program is the National Register of Historic Places (NRHP). [33] The NRHP operates through the NPS within the Department of the Interior, and it serves as the official list of places recognized as important to U.S. history and prehistory on the local, state, and/or national level. Bulletin 15 outlines the review process for listing on the NRHP, including the criteria and how to apply those criteria to a property. A property

[30] Ashish Valentine, "'The Wrong Complexion For Protection.' How Race Shaped America's Roadways And Cities," *NPR,* July 2020, https://www.npr.org/2020/07/05/887386869/how-transportation-racism-shaped-america.

[31] Antiquities Act, 16 U.S.C. 431-433.

[32] **Historic Sites Act of 1935, 16 U.S.C. sec. 461-467.**

[33] *National Historic Preservation Act* of 1966, 36 CFR 60.

must be a building, structure, site, district, or object in order to qualify, and the significance and integrity of the place must be documented and well supported. [34]

A property must qualify under one of the four criteria of significance on the NRHP. Criteria A is "associated with events that have made a significant contribution to the broad patterns of our history;" Criteria B is "associated with the lives of persons significant in our past;" Criteria C can "embody the distinctive characteristics of a type, period, or method of construction, or that represent the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction"; and Criteria D is a place that has "yielded, or may be likely to yield, information important in prehistory or history." [35] The Bulletin requires hose nominating a property to consider which criteria pertains to the place in question, determine which time period or point in history or prehistory the place represents, connect the criteria to the historical context, determine if the property type is included in the special considerations, and finally determine the integrity of the property.

Integrity is the ability of a property to convey its significance and the NRHP measures it in seven ways: location, design, setting materials, workmanship, feeling, and association. As the bulletin states, the integrity of a property "must always be grounded in an understanding of a property's physical features and how they relate to its significance." [36] Though the significance of a place must be well argued within one of the four criteria, integrity can be more difficult to argue as it requires an evaluation of how

[34] Bulletin 15, i.
[35] Ibid., 2.
[36] Ibid., 44.

the property can communicate its significance. Location refers to the original location the historic property existed or the place where the historic event took place. Design refers to the form, plan, space, structure, and style of a property, and it should reflect the historical technology and function. In a historic district, design also refers to the spatial relationship between the different properties. Setting refers to the physical environment of the property or district, especially in regard to the environment's character and relationship to the property. Integrity of materials is the retention or preservation of the historic physical materials and features, ensuring the place is not reconstructed. Workmanship is the physical characteristics of a culture or people's craftsmanship. It can apply to a full property or components of a property, and it can provide evidence of the time period's important technologies and aesthetics. Feeling is a place's ability to convey the historic aesthetic and sense of the significant time period. Finally, association is the direct relationship and the ability to convey the relationship between the property and the historic event or person. A property does not necessarily need to have all seven aspects of integrity in order to successfully communicate its significance, however the bulletin states a property with integrity should have several or most of the aspects. [37]

Traditional Cultural Properties

Bulletin 38

Patricia Parker and Thomas King wrote and published the National Register Bulletin 38, commonly known as Bulletin 38, in 1990 and titled it "Guidelines for

[37] Ibid., 44.

Evaluating and Documenting Traditional Cultural Properties." They define a TCP as a property that has a role in a "community's historically rooted beliefs, customs, and practices." A TCP is one that is eligible for the NRHP due to its connection with a living community, both in that community's history and the continuation of its cultural practices and/or beliefs. Parker and King created the additional layer of the policy in an attempt to make the NRHP and its criteria more broadly applicable to different cultural groups and their historic spaces. Born out of the desires and calls to make the NRHP less ethnocentric, Bulletin 38 established the language incorporating the new layer in determining historic and cultural significance and integrity. [38]

In order to evaluate the integrity of a potential TCP, the TCP process first prioritizes the integrity of relationship and integrity of condition. A TCP maintains integrity of relationship when it is considered important to the cultural group in regard to sustaining a belief or a cultural practice. Integrity of condition can also be fairly malleable as it acknowledges how a place may maintain cultural importance despite physical modifications and changes over time. This consideration can be acutely pertinent to the Gullah Geechee communities experiencing tangible changes to their built environment through the years of highway development. As Mr. Richard Habersham from Phillips Community points out in Chapter 5, the appearance of their properties, what was grown on the land, and what buildings were on the land may have changed over time, but the property is still serving the same historical and cultural purpose to each generation. This direct acknowledgement of change in appearance but no change in

[38] Bulletin 38.

historical or cultural significance as defined by someone from the community is the exact reality King and Parker highlight. Similar to the process of evaluating significance, the question of integrity should be approached from the community's perspective. Bulletin 38 stresses that "the integrity of a possible traditional cultural property must be considered with reference to the views of traditional practitioners; if its integrity has not been lost in their eyes, it probably has sufficient integrity to justify further evaluation." [39]

A TCP must meet at least one of the four criteria of significance as outlined in the NRHP. In regard to criteria A, "events" may refer to individual historical events or it may refer to a broad pattern or theme in history. Criterion B can be associations with the lives of persons significant specifically to the traditional culture's past, and it can include gods and demigods important to a group's traditions. Criteria C is also more inclusive of a traditional culture and its artisans and high artistic value. Criteria D with the history of yielding or the potential to yield information is also very similar to the standard criteria, with the exception that it should be secondary to its association with the traditional culture and the continuation of the culture.

It is very important to note that while Bulletin 38 creates the framework for TCPs, there is no special category for this type of property. In writing and explaining the significance and integrity of the property, the property should be referenced as a TCP, and the framework must be clearly threaded throughout. While the framework serves to recognize certain properties as TCPs, the process to identify them as such is not as explicit as it is for other criteria. Because the TCP definitions of integrity do not

[39] Bulletin 38, 10.

necessarily rely on the physical integrity of a property, they seem to stand in some opposition to the traditional NRHP aspects of integrity, which do heavily rely on the physical fabric of a place. One way to reconcile the seemingly contradictory criteria is through the concept of storyscapes.

Storyscapes

The priority to not only incorporate but base the resource evaluations on the thoughts and experiences of the traditional culture is foundational to the concept of TCPs. Bulletin 38 provides the context and lens through which to evaluate TCPs with the NRHP criteria. The criteria for significance as a TCP do not necessarily change from the standard NRHP, though the meaning of "our" the criteria can apply to the history of the traditional culture alone; for example, the association with the lives of persons significant to the culture's past. However, integrity of the place can be interpreted in a very different way than the standard seven measures because TCPs can prioritize integrity of relationship and condition over the conventional seven aspects. TCPs integrity definitions acknowledge that change or loss of the historic built environment do not necessarily alter or sever the integrity of relationship or condition to a place, an application of the policy that maybe seems to some at odds with itself. One way to reconcile those seemingly dueling definitions is through storyscapes which create intersection of historical identity and the built environment.

Like conservation laws protecting natural resources like water and air, historic preservation functions to protect architecture and other resources in the built

environment. Kauffman refers to the places in our communities with historical, cultural, and/or social value as "story sites." Every resident of a community has their own individual experiences, memories, and connections to places in their community, and it is these individual stories that coalesce into one larger culture. Sometimes these places of community history and attachment also have more architectural merit than a vernacular building, but they do not necessarily need to have a perceived aesthetic, architectural, or environmental value to still maintain a cultural bond. Kauffman argues that sites of importance do not need to have a tangibly measurable quality to them in order to be important. [40]

The strong memories and associations a person has to a place are important not only because of those individuals' relationships to that place but also because they connect people together with their shared experiences. The places are often public spaces outside of residential homes and can include everything from coffee shops, barber shops, to a tree in the park. The social and cultural capital exists in the hearts and minds of people in a community, but it is expressed through the places in that community. [41] Identifying that neighborhood identity can be challenging as every community may express itself in different ways.

Anthropologists, folklorists, historians, and geographers among others and the best practices from their fields should inform any survey cultural resources, and especially potential storyscapes and historic sites that may lie outside of conventional

[40] Ned Kauffman, *Place, Race, and Story: Essays on the Past and Future of Historic Preservation*, London: Taylor and Francis, 2009, 40-47.
[41] Ibid., 46.

criteria. Written surveys, interviews, public meetings, informal conversations either planned or impromptu, can all be excellent ways of reaching out and interacting with community members. The guidance Kauffman offers, as King does, is to approach community members in ways in which they will hear you and understand that there will not be one way of doing it for every person in every community. [42]

As Kauffman points out, the NRHP is not necessarily amenable to a storyscape, as the NRHP often requires a place to be more closely related to a specific person or event, or to have significant architectural merit. As he has described them, storyscapes frequently do not fit into one of those identifiable criteria the NRHP creates. However, as this thesis argues, Kauffman too argues that the TCP concept can extend to a variety of places. Though the concept has been utilized predominately by Native American communities, Kauffman like others points out the TCP concept does not exclude other types of sites and communities. His caveat, like that of many others, is the TCP concept has not been widely explored outside of Native American communities. Some sites like the Bohemian Hall in Queens have been successful, but others like Stiltsville have not. He questions whether certain sites can be referred to as traditional, as the NRHP does not provide a definition of what constitutes traditional. Moreover, it does not define the parameters of a culture. Because the two words are not defined, there is room for interpretation, to allow communities to define what they consider is both traditional and cultural. However, it also provides room for the NPS to decide what is and is not traditional or cultural. Kauffman suggests that the NPS may be more inclined to accept a

[42] Ibid., 53-54.

site as being linked to a specific culture if there are more commonly associated characteristics like a specific ethnicity or oral history traditions. Additionally, the park service may be less likely to accept a place as a TCP if the associated community no longer lives in the area, even if the site is still used. [43] While the NPS's TCP parameters are broad enough to allow for interpretation, the park service may still create their own, narrower parameters of interpretation.

Traditional Cultural Properties

Parker and King reference the contemporary changing ideologies at the NRHP like the 1980 amendments to the NHPA, which were meant to emphasize the importance of intangible cultural heritage. This bulletin follows the 1980 amendments' themes of expanding the definitions of significance and integrity, but this bulletin does not only apply to intangible heritage but also to a place's physical characteristics. The nearly 20-page bulletin provides examples of different types of TCPs, ranging from rural areas to urban examples to native or indigenous places. The bulletin takes care to explicitly declare that while Native American tribes and places have helped inspire the need for TCPs, the category is not limited to only native spaces. The bulletin illustrates several examples of different TCPs including Honolulu's Chinatown and Columbus, Ohio's German Village Historic District. [44]

TCPs can be difficult to observe to one outside of the culture, for example an observer may be able to visually identify a building as important because it is a place

[43] Ibid., 66-67.
[44] Patricia L. Parker, and Thomas F. King. Chinatown is mentioned pages 5 & 11, German Village Historic District page 2.

where human activity occurs but may not be able to recognize an empty field as equally important. The purpose of using TCPs is to avoid ethnocentrism, in that the one cannot judge the field as not culturally significant just because there the presence of something familiar, like the building, is not there. The most fundamental aspect of identifying a TCP is the role the space has in a community and its culture/beliefs, integral to its history and the continuation of its culture. Another distinguishing concept of TCPs, and one that can pertain heavily to Gullah Geechee spaces, is that the area may represent the broad pattern of a historic place, a concept that honors the total history of a place rather than a specific moment in the area's history. [45]

Thomas King has revisited the concept of TCPs in years since its 1990 publication, particularly in reference to the application of the concept within the NRHP criteria. In King's 2003 book *Places that Count*, he provides different thoughts on how TCPs can and should be applied after years of reflecting on the differences between its theory and its application. King warns against relying too heavily on the stamp of approval for determinations of eligibility from a formal perspective at the NRHP. He suggests that while a more informal "consensus determination" from the SHPO or a tribal historic preservation office can be helpful in triggering the considerations for historic spaces required in the Section 106 review, a formal determination from a reviewer at the NRHP may not be helpful unless the community wishes to pursue a nomination. He writes that the requirements in a nomination can influence the keeper in their formal

[45] Bulletin 38, 1-4.

determination process, when the extent of the nomination standards should not overlap with the standards for eligibility. [46]

King also warns against the discerning professional eye the NRHP uses in evaluating places' significance and historic resources in other ways including language and semantics. Parker and King repeatedly stated in the original Bulletin 38 document that TCPs were created to broaden the definition of significance beyond the bureaucratic perspective at the NRHP, and King repeatedly states in several of his writings that despite those intentions, the TCPs have often fallen into the same pitfalls King and Parker tried to avoid. King brings attention to a case study in Alaska in which the indigenous Tlingit people tried to nominate the Kiks.adi Survival March Route to the NRHP as a TCP but ran into several issues. In 1804, Russians attached the Tlingits' village near what is now Sitka territory in Alaska, and the Tlingit people were forced to retreat across what is now the Tongass National Forest. Sitka members have recreated the march in the years since and became worried about the conservation of the route when the National Forest planned to sell parcels of the land for timber. The first issue was the way in which the Tlingit people referred to the landscape; they called the survival march route a "trail" which had a different associated meaning for the preservation professionals at the NRHP who saw that word and associated physical evidence of passage like wagon ruts with the space. In addition to the lack of physical evidence on the route itself, the NRHP staff found the route ineligible given there were no documented landmarks and there was no evidence of continuing use. The tribe disagreed with the decision, citing the lack of a

[46] Thomas King, *Places That Count: Traditional Cultural Properties in Cultural Resource Management* Walnut Creek, CA: Altamira Press, 2003 158-164.

written language used by their ancestors and the tradition of oral history and the reality that the ancestors would have walked given they did not use transportation technology like wagons. They also disagreed with the continued use argument in that while the Russians were not still attacking and forcing the tribe to flee, the tribe did still use the route, especially in reenactments. King suggests that perhaps if the NRHP staff had not assumed their definition of "trail" were the same as that of the tribe, the ways in which the staff evaluated the physical space may have been different. He also suggests that a less formal consensus determination, rather than the more discerning nomination eye, could have suited the project and benefited the interests of the Sitka tribe in protecting the passage. [47]

As King points out, cultural significance is not as easily quantifiable from the professional point of view as are other criteria such as physical integrity. He believes that the interpretation of significance and the TCP designation within the criteria has been too narrow, and while the language from Bulletin 38 is not without any criticism, the NRHP must be rethought rather than the concept of TCPs. King maintains the NRHP was created to serve the public and feels the NRHP often loses sight of its role as a public service. He and his co-author Patricia King created TCPs to give the power back to communities to preserve their historic spaces and define their own significance. [48]

King points out that TCPs must still work within the boundaries created by the NRHP and do not necessarily make intangible culture eligible for the NRHP simply

[47] Ibid., 164-166.
[48] Thomas King, "Rethinking Traditional Cultural Properties?" The George Wright forum 26, no. 1, January 1, 2009, http://www.georgewright.org/261king.pdf.

through the lens of TCPs. Many of the connections a current culture may have to their historic resources may of course be intangible, as most if not all cultural values have an intangible foundation, however there must still be a clear physical space to qualify under Section 106. [49] King also writes that the impediments to listing TCPs or using the Bulletin 38 guidelines to list a site on the NRHP is often due to the thoughts and actions of preservation professionals rather than the guidelines for identifying TCPs themselves. The miscommunications or misinterpretations can result from a lack of partnership with the community with the historic site, their inexperience with TCPs, their perceptions of what is required of a TCP within the NRHP, and even preservationists' mindset as it relates to concepts of place, culture, and tradition. King additionally points out the potential for cross cultural differences especially in regard to language, definitions of significance, both in regard to jargon but also different ways of thinking.

But he emphasizes finding strength in compromise and seeking to understand other parties' points of view. Sometimes agreements cannot be reached, but this outcome is usually and should be rare given the preservation professionals involved in the project should do everything in their power to prevent this outcome. To avoid the pitfalls that King outlines, he suggests preservationists take certain measures to be patient and actively listen to a community. Taking a position can lead to issues in consulting with a group of people because one consulting party has already taken a viewpoint or made a decision. Rather it is better to approach a conversation with the intent to discuss options rather than proposition a particular viewpoint or option. Seeking to understand the

[49] Thomas King, *Places that Count,* 264-265.

reasons behind community positions can result in mutual gain for both parties, something that is fundamental to any negotiation. [50]

One important concern regarding TCPs is brought to attention by Robert H. Winthrop in that he questions if and how the term "traditional" allows for a place to change and grow. One defining characteristic of TCPs is the continuation of use and activity in the historic place by its community, but his concern is that it does not provide a framework for how said place and adapt and change to the wants and needs of the community. [51] However much of the professional discourse surrounding the drawbacks of TCPs are of a similar nature to the points made by both Ned Kauffman and Thomas King himself; how the failure in the TCP concept is not in the concept but rather the interpretation and application in real communities. Paul Lousignan too argues that the bureaucratic nature of the NPS and its system of reading nominations can sometimes prevent TCPs from being considered by those who may have the power to argue in their support. The NRHP reviewers, he maintains, only handle a few cases every year while the majority of nominations and cases are made outside of their domain. It is possible that more TCPs could be evaluated and successfully listed to the NRHP if they are given the proper platform to do so. [52]

Though Bulletin 38 and Thomas King's subsequent work provide much insight into the evaluations and definitions of TCPs, the process through the NRHP is not

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[50] Ibid., 233-241.
[51] Robert H. Winthrop, "Tradition, Authenticity, and Dislocation: Some Dilemmas of Traditional Cultural Property Studies," *Practicing Anthropology* 20, no. 3 (1998): 25-27, Accessed October 13, 2020, http://www.jstor.org/stable/24781282.
[52] Paul R. Lusignan, "Traditional Cultural Places and the National Register," The George Wright Forum 26 (1): pp. 37-44. http://www.georgewright.org/261.pdf

necessarily streamlined. There is no simple box to check or field to fill out that recognizes a property as a TCP through the NRHP nomination or evaluation process. Because there is no explicitly defined field to apply for TCPs, there is no consistency in the NRHP for TCPs. As Chapter 4 will elaborate, there is no central list of TCPs on the NRHP nor are they searchable unlike the broad categories like type of property. Some TCPs incorporate the classification into the listing name, but this may not be desirable or practical for every property or every culture. Additionally, a property may serve more than one group or more than one traditional culture. An additional field simply indicating whether a property is or is not a TCP could be a first step to reconcile and incorporate the consideration into the larger NRHP framework.

The apparent limited number of case studies and analyses of TCPs in the preservation field demonstrates the concept is still novel and exploratory for many preservationists and communities. At the time of this publication, there are no TCPs in the state of South Carolina, and the designation has never been extended to apply to Gullah Geechee resources. The SHPO provides a helpful and informative guide to TCPs on its website, created February 2020, condensing Bulletin 38 into a shorter, more accessible format online for those interested in the classification. The page also lists various NRHP listed properties in the state that may not be identified as TCPs by the NRHP but could be or could have been interpreted and positioned as such. [53]

[53] See "Traditional Cultural Properties in South Carolina: Identification and Evaluation for Section 106" https://shpo.sc.gov/sites/default/files/Documents/Historic%20Preservation%20(SHPO)/Programs/Programs/Review%20and%20Compliance/TCPs-106Guidance.pdf

It appears that historically NHPA-related projects can be biased or exclusionary towards Black resources. The criteria for significance and integrity with its emphasis on the built environment, and a certain type of built environment, can be exclusionary to certain groups with different types of cultural resources. TCPs are one way to address this disjuncture by acknowledging the significance and integrity outside of the euro-centric standards that influenced the NRHP policies. As the next chapter illustrates, there is a limited number of listed TCPs on the NRHP. With a limited number of listings there are few examples of how to list different types of properties as TCPs. However, the concepts outlined in Thomas King and Patricia Parker's writings and storyscapes can provide a path forward to TCP eligibility through community-based perceptions of significance and integrity.

Site Setting

Though the two case studies are not located in the same town or county, they are both Gullah Geechee communities and share in their similar histories and connections to the past. Before analyzing the interviews from the two neighborhoods, below is a short site setting for each community that provides the history and the context of the current highway projects that inspired this research.

The Gullah Geechee

The Gullah Geechee people are descendants of Africans who were enslaved on the rice, Sea Island cotton, and indigo plantations in the lower Atlantic states of North Carolina, South Carolina, Florida, and Georgia. The isolation on the plantations and the

mixture of African cultures created a unique culture that continued in communities through emancipation to the present day. Sometimes purchasing land through the Freedmen's Bureau or the South Carolina Land Commission, families established small communities throughout the Lowcountry. [54]

From Emancipation through much of the 20th century, these Gullah Geechee communities remained in relative isolation due to geographical locations and boundaries, and a desire to remain distant from the oppressive Jim Crow environment. [55] The early 20th century began to bring change to the isolation of many Gullah Geechee communities. As transportation infrastructure like bridges were built, more people could access the coastal areas. The military bases along the coast and the post-war boom brought more people to the coasts and with them, more pressure on the Gullah Geechee communities.

[54] "Low Country Gullah Culture Special Resource Study and Final Environmental Impact Statement," National Park Service, 2005, 51.
[55] Management Plan, Gullah Geechee Cultural Heritage Corridor, 5-8.

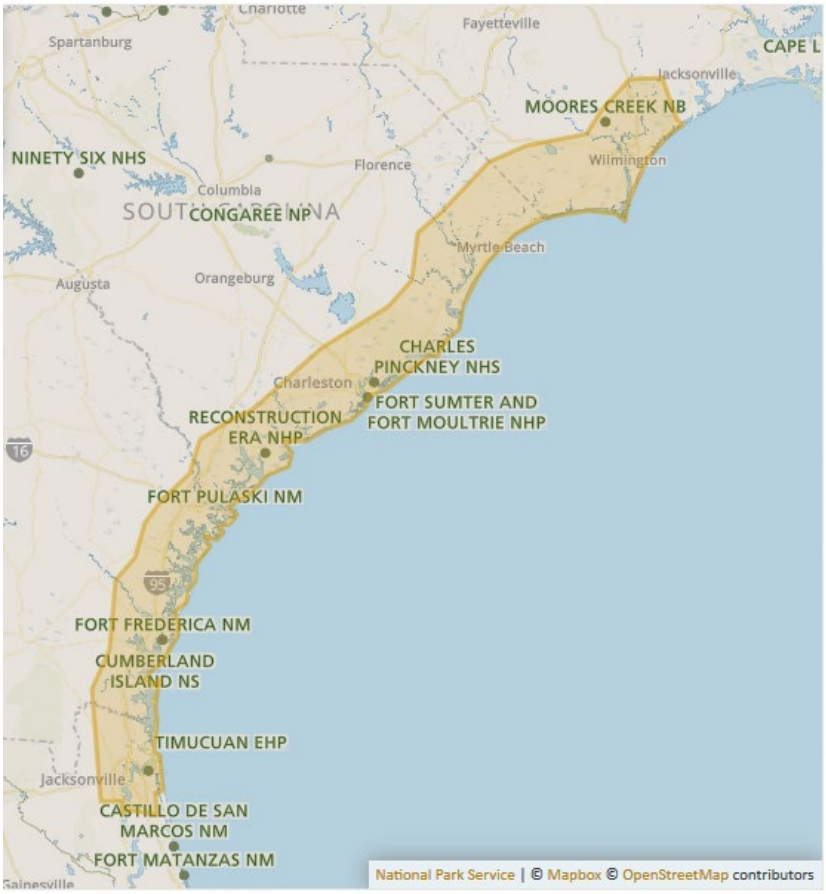

Figure 2.1 shows the Gullah Geechee Cultural Heritage Corridor, from the NPS. https://www.nps.gov/places/gullah-geechee-cultural-heritage-corridor.htm

In 2000 the NPS began the process of surveying Gullah Geechee cultural resources in order to assess both the national significance of the culture and the potential of adding resources to the NPS. From that survey, the NPS established in 2006 the Gullah Geechee Cultural Heritage Corridor to recognize the distinct culture and traditions, and natural and cultural resources. The accompanying management plan outlines the creation of the corridor, defines the scope of the corridor, provides the management framework, and provides an interpretive framework for the corridor's future.

The Gullah Geechee Management Plan outlines nine distinct aspects of Gullah Geechee culture: The Gullah Geechee language contains elements of the languages from African ancestors, and it is the only distinct African creole language in the US; there is a strong connection to family and community; a spirituality and belief in divine guidance that influences individuals and communities; education is integral to families and communities on the whole; there is a history and culture of organizing and resistance, and an "unremitting refusal to acquiesce to social dominance;" there is an equitable respect of genders in communities; there is a belief that an economic independence can lead to success; land and water sources are seen as sources of life and often the site of burial practices; and a belief in community-based conflict resolution. [56] Elements of Gullah Geechee culture also manifest in distinct ways including but not limited to the arts, cuisine, and crafts. [57]

As the communities pertain to the NRHP, the physical appearance of the overall property and building patterns factor into its evaluations and considerations. Gullah Geechee communities may sometimes appear to the unfamiliar eye as not recognizable communities given the changes in historic integrity through the loss of historic buildings and structures, modern modifications to historic structures and buildings, and new infill. As Chapter 5 will explore further, because the standard criterion outlined in the NRHP prioritize physical integrity of a property, the survey of Gullah Geechee communities like Stoney and Phillips Communities may also focus on the physical integrity of their

[56] Ibid., 5.
[57] "The Gullah Geechee," Gullah Geechee Cultural Heritage Corridor Commission. https://gullahgeecheecorridor.org/thegullahgeechee/

resources. However, integrity may manifest differently in these communities than it may in properties that fit the standard NRHP mold. Images of the two case study communities are included on the following pages.

Stoney Community

Stoney Community is known as the "Gateway to Hilton Head Island," spanning from Jenkins Island to the tidal creek near the Spanish Wells Road intersection and is one of several Gullah Geechee communities on the island. Named after the Stoney Plantation that existed on the island prior to the Civil War, Stoney Community as it is now, was founded after the Civil War when the government sold acres of land from the former Fairfield plantation. Starting in the late 1880's and early 1890's different Black families began purchasing land in the area and established what became known as Stoney. The descendants of those landowners still live on their ancestors' land now. Schools, churches, and several businesses served the island within Stoney's neighborhood, and some islanders took small boats to and from places like St. Helena and Savannah. In the 20th century, Stoney Community became a commercial center for the island given its proximity to the mainland both before and after the bridge. When the James F. Byrnes bridge was built connecting Hilton Head to the mainland through Stoney, Stoney became the gateway to the island and saw an increase in business at the same time as a great change to community. [58]

[58] Research Study of the Historic Stoney Community, New South Associates Technical Report, New South Associates, 2010, 1-6.

According to the town's website, Hilton Head adopted a new master plan and determined Stoney Community was a key study area given its location on the island, and development opportunities. Out of the charrette came the Stoney Initiative Area Plan, which focuses on the neighborhood's land use, density, and infrastructure. [59] The report was prepared by the Town of Hilton Head Island Planning Department and adopted by the Hilton Head Island Town Council in 2003. In the executive summary, the plan establishes the rights and the wishes of the community members: "This is their family land, it provides ties to their culture, and plays an important role in their lives." The stated goal from the plan was to provide a higher quality of life for those in Stoney Community through combining residential and commercial spaces in the neighborhood, as well as incorporating redevelopment while protecting the character of Stoney. [60]

Highway 278 leading into Hilton Head Island runs right through the community. It has been widened once before after the initial construction, expanding from two to four lanes. These highway expansions have historically displaced some community members after the highway encroached too close to their homes. [61] The proposal now is to expand the highway from four to six lanes.

In 2020, the SCDOT hired New South Associates to perform a survey of Stoney Community and its ability to be evaluated as a historic district and a TCP under the NRHP standards. The survey looked at the community through significance in

[59] The charrette was not included in the comprehensive plan, but a list of participants is included on page iii. Stoney Initiative Area Plan, Hilton Head Island Comprehensive Plan, Town of Hilton Head Island Planning Department, March 4, 2003. https://www.hiltonheadislandsc.gov/publications/plans/Stoney_Initiative_Area_Plan.pdf
[60] Ibid., ES-1.
[61] Adam Parker, "5 road projects threaten long-established Black communities across the Lowcountry," *Post and Courier*.

commerce, African American history, community planning, and agriculture, but found the community unable to adequately convey that significance with respect to the NRHP. The initial findings from New South recommended the community was not eligible to be evaluated as a historic district or considered a TCP citing a cumulative loss of integrity. As of the writing of this report, they have received comments from Heather Hodges, then director of GGCHC and are reassessing their initial conclusion that Stoney Community was ineligible to be evaluated. A further breakdown of their conclusions, the response to those conclusions, and an exploration of the disconnect can be found in Chapter 5.

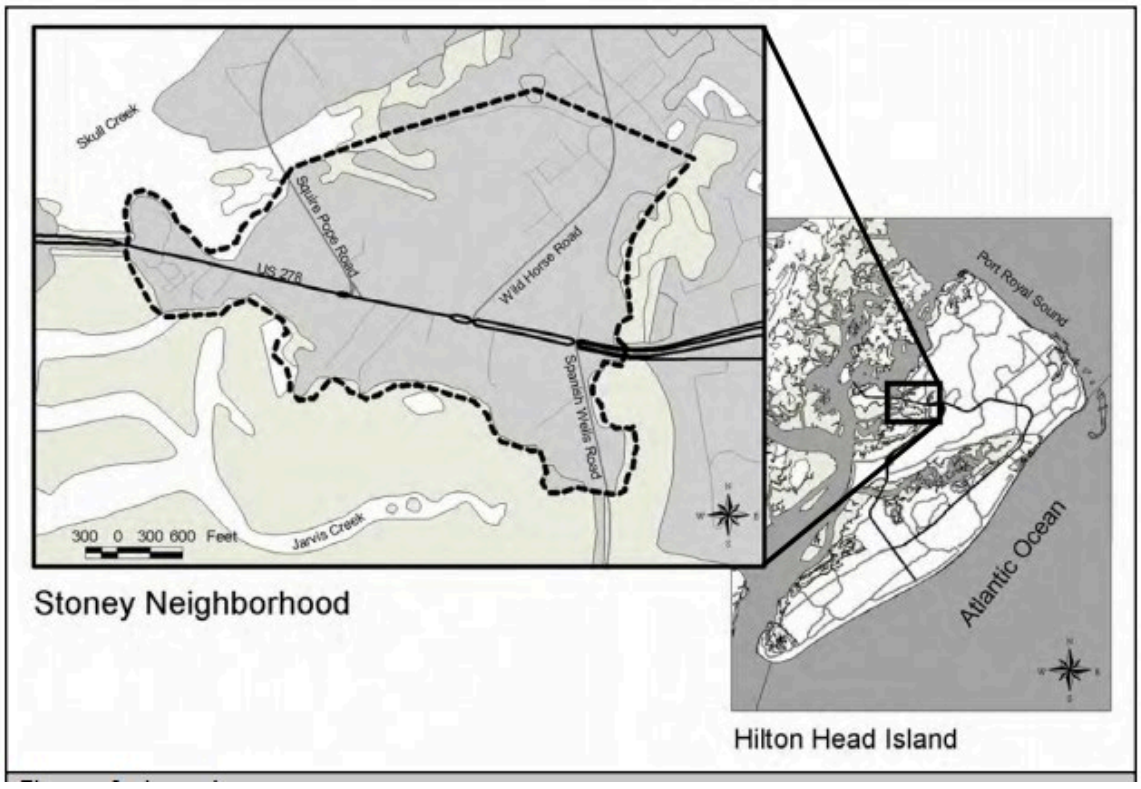

Figure 2.2 shows the location and boundary of Stoney Community within Hilton Head Island. From the Stoney Initiative Area Plan, page 1.
https://www.hiltonheadislandsc.gov/publications/plans/Stoney_Initiative_Area_Plan.pdf

Figure 2.3 Image of one Gullah Geechee resident's home in Hilton Head, the pine tree sits 25 feet from Highway 278. From the Island Packet. https://www.islandpacket.com/news/local/article229839489.html.

Figure 2.4 Image of Highway 278 facing east near the Crazy Crab restaurant, from Google Maps.

Figure 2.5 Image of Tressa's Gullah Girl Botique on Highway 278. Photo from the Island Packet. https://www.islandpacket.com/news/local/article229839489.html.

Figure 2.6 Image of historic house on Amelia Drive, from New South Associates, page 37.

Figure 2.7 Image of non-historic houses on Amelia Drive, from New South Associates, page 37.

Phillips Community

Before Phillips Community in Mount Pleasant, SC was founded, the area was first associated with the Rutledge family and then the Laurel Hill plantation. Phillips Community was founded in 1878 when freedmen and their families bought land through the South Carolina Land Commission. Phillips was a primarily residential neighborhood and like Stoney and many other settlement communities in the Gullah Geechee corridor, the descendants of those original founders have retained their land and still live in the community today. The two maps on the following pages show the differences between the highway placement in the community before and after the highway was paved; whereas the road initially went around most property lines, the revitalized road in the second image runs directly through the neighborhood.

The Charleston County Historic Resources Update created by New South Associates in 2016 for the Charleston County Planning Department details the variety of historically significant places and structures in the county. In the report, New South Associates state that in 2009, they recommended the sweet grass basket corridor in Mount Pleasant along Highway 41 be considered a TCP on the NRHP. Additionally, the 2016 Survey Update contains a letter from 2010 in which the senior architectural historian at the SHPO at the time also recommended that Phillips Community be listed as a TCP on the NRHP.

He outlines the various ways in which the community could be eligible as a TCP particularly through a demonstrated integrity of relationship and condition. The letter cites the retention of historic plat lines and boundaries, and the continuation of the

original settlers' lineage, as most of the community residents are descendants of the original families. He also explains that though the landscape does not contain as many original or historic buildings and structures as other historic districts do, the unique physical and cultural landscape was more than significant enough to earn the community a NRHP nomination. [62] Phillips is not currently listed on the NRHP though the community is seeking a nomination as a historic district.

Similar to Stoney Community, Highway 41 was also constructed directly through the neighborhood in the early 20th century. The years of traffic, expansion to more lanes, and encroaching development from new neighborhoods have affected the physical integrity of some of the neighborhood's resources. However, the SHPO still found the TCP integrity of relationship and condition to be sustained. Similarly, the environmental firm HDR conducted a landscape technical report on Phillips as a part of the Highway 41 project, and they too concluded the community maintains its integrity of relationship and condition. [63]

[62] New South Associates, "Charleston County Historic Resources Survey Update," Charleston County Zoning and Planning Department, 311-312.
[63] "Phillips Community Cultural Landscape Technical Report." HDR. June 3, 2018. http://www.hwy41sc.com/assets/documents/SC41_Phillips_Community_20180406_HRS-20180621_Reduced.pdf

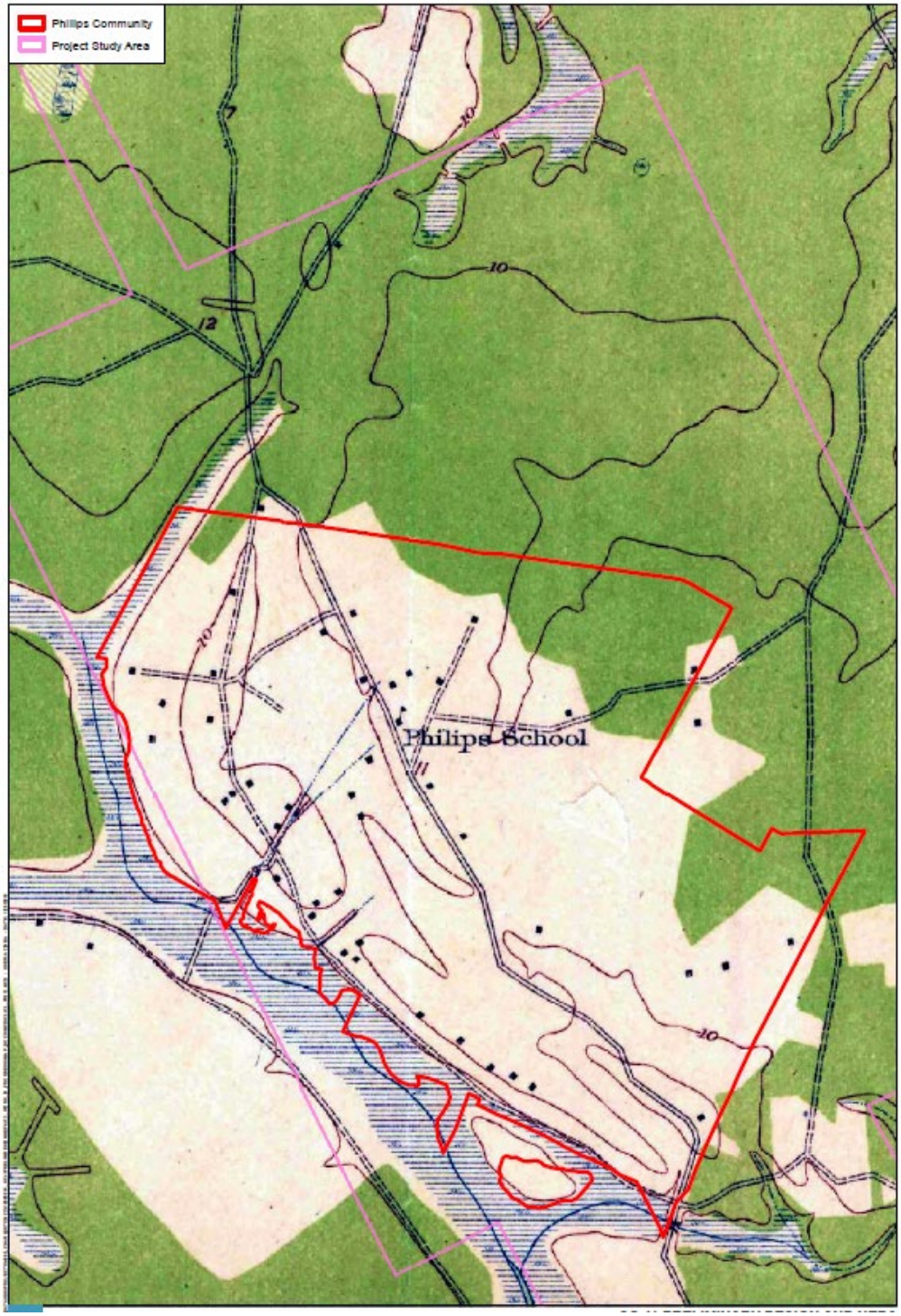

Figure 2.8 is a 1926 map of Phillips, shows the older roads that go around the neighborhood. From the Phillips Community Cultural Landscape Technical Report.

Figure 2.9 is a 1957 map of Phillips, shows Highway 41 in contrast to the old road lines. From the Phillips Community Cultural Landscape Technical Report.

Figure 2.10 Image of Phillips Community member Ada Bennett waiting to cross the street to go to her cousin's house. From the Post and Courier.
https://www.postandcourier.com/news/widening-highway-41-would-take-family-land-in-phillips-but-owners-could-go-unpaid/article_b03f0dea-e974-11ea-b257-3faa34777fe3.html

Figure 2.11 US Highway 41 crosses Horlbeck Creek in Mount Pleasant, SC. From the Post and Courier. https://www.postandcourier.com/news/charleston-county-offers-new-highway-41-plan-after-phillips-community-threatened/article_7e43f24c-7d21-11eb-9c93-ab7f799ffae1.html

CHAPTER THREE

METHODOLOGY

Introduction to the Data

Three datasets inform the basis and analysis of this thesis: a comprehensive list and scope of current TCP listings, primary and secondary sources pertaining to the history and landscapes of both Stoney and Phillips, and transcripts of interviews conducted with members of the two communities. This chapter outlines the data collection process and the methods of analysis. The data collection and analysis for the interviews in particular create a narrative through which one can determine how some people in these Gullah Geechee communities may define the NRHP significance of their historic communities and resources. The objective of this analysis was deriving information to inform and develop how preservation professionals can evaluate the historical significance and integrity of resources from the perspective of those who experience and share the traditional culture.

The main subset of data for this thesis is the interview collections and transcriptions from the two communities discussed in the research. At the time of this thesis, the recent and ongoing processes with the two communities have necessitated different interactions with the SCDOT, Charleston County, local preservationists, and their own community partners, so an abundance of interviews and meetings both in person and virtually have taken place over the last year. The decision to use the

preexisting information and interviews was reached given the abundance of information and the timing of the school year.

List of TCPs

In order to contextualize the two case studies within the world of TCPs, it is important to understand its current reach through both quantification and visualization. Because much of the literature regarding TCPs contemplates the limited number of sites and a lack of variation in groups who utilize the tool, quantifying and visualizing those numbers is a critical component of placing this study in the context of TCPs. An unofficial list compiled by Paul Lousignan of the NPS out of personal interest was used as a foundation for the list of TCPs included in this thesis. [64]

Each SHPO website was located, or the official state preservation website if there is no individual SHPO website. The decision to search the websites as well as individually googling the phrase "[state] traditional cultural properties" or "[state] traditional cultural places" in order to understand the accessibility of locating this information. The Native American distinction was determined important to quantify and illustrate distribution in order to either validate or disprove the overarching narrative that TCPs have predominantly been Native American. If the TCP was not explicitly associated with a Native American Tribe, any other ethnic or cultural affiliations were noted in the list. The compiled list was then checked with the full list available through the NPS website. This list is available as an excel spreadsheet and is sorted by state. The number of known TCPs in each state was then compared to the number of properties on

[64] Correspondence with Paul Lusignan and Will Cook, email message, December 21, 2020.

the NRHP. [65] It is important to note that because there is not an official list and because properties are not always explicitly referred to as TCPs in their listings, there are likely properties considered to be TCPs that are not on this project's list.

TCP Map and Distribution

A map of the total amount of properties on the NRHP is included in chapter 4. A map of all the listings on the NRHP is available online, and the spatial information from the map is available to download. [66] The points and polygons for buildings, structures, sites, districts, and objects are available within the same file. According to the FAQ of the data download, the data set was initially compiled in 2012. It was updated first in 2014 and again in 2017. The data does not necessarily include each of the over 96,000 places currently on the Register; the NPS provides a disclaimer with the files that explains the map was created in 2012 and while it has been modified since then, places from 2012-present may be missing from the data. [67] The inclusion of this map is therefore a representation of the NRHP listings around the world and is meant to provide context of the NRHP rather than specific geographic data.

To create the map of TCPs from the compiled TCP list, approximate coordinates were used. The properties with available coordinates from the NRHP were used. Some properties are address restricted, so the coordinates for those properties were derived

[65] Data Downloads, National Register of Historic Places, National Park Service, https://www.nps.gov/subjects/nationalregister/data-downloads.htm.
[66] Geospatial Dataset, Data Store: Integrated Resource Management Applications, National Park Service, U.S. Department of the Interior, https://irma.nps.gov/DataStore/Reference/Profile/2210280
[67] NPS updated the list in 2014 and 2017 but encountered some issues entering the data. The FAQ can be found here: https://irma.nps.gov/DataStore/DownloadFile/647157

from the listed town on the NRHP listings excel spreadsheet. These maps displaying the distribution of total TCPs, their geographic locations, their affiliations with certain ethnic or cultural groups are included in Chapter 4. Because a central list of TCPs does not exist publicly, this thesis provides a list of known TCPs both in Chapter 4 and in Appendix A.

Primary and Secondary Sources

Historical information about Stoney Community was collected from the SCDOT and New South Associates documents shared from the Highway 278 project. As mentioned, The Hilton Head Island website also contains information about the community through the Stoney Initiative Area Redevelopment Plan. [68] Additionally, the Island's Gullah Geechee Land and Cultural Preservation Task Force draft available online provided more historical context, current and historic maps of Stoney Community and Hilton Head, and more insight into the wishes and experiences of community members.

Included in the 2016 Charleston County Historic Resources Survey update, a letter from the South Carolina SHPO to Mr. Habersham from the Phillips Community suggests that the community could be eligible as a TCP on the NRHP if the community chose to use that framework in its potential nomination or determination of eligibility. [69] The easily located and accessible online Phillips Community Cultural Landscape Technical Report provided much information for this thesis, and though there were interviews similarly conducted for that project, this thesis was unable to receive

[68] Stoney Initiative Area Plan, Hilton Head Island Comprehensive Plan, Town of Hilton Head Island Planning Department, March 4, 2003.
[69] Charleston County Historic Resources Update. Appendix D SCDAH Correspondence.

permissions to use the data. [70] Additionally, because the two places have had relatively high profiles in local newspapers and media outlets, there were some excerpts of interviews published online.

Community Interviews

Before beginning the interview collection and analysis, understanding how the research should adhere to Clemson University's Institutional Review Board or IRB was necessary. Clemson's IRB does not require students to obtain approval for the collection of oral histories or interviews with targeted individuals. [71] The research for this thesis consisted of preexisting targeted interviews in Stoney Community conducted by a third party and one new interview with one targeted individual from Phillips Community with the author. The community members from Stoney were originally interviewed by Velma Fann from New South Associates, who also contacted them for this request of use. An exploration of the questions and the responses can be found in Chapter 5. Additionally, the author's questions to the Phillips Community member can be found in appendix C.

Stoney Community Interview Collection

The decision to use preexisting interviews conducted in Fall 2020 came about through the thesis committee process. Heather Hodges, who is on the committee for this thesis, was then the director for the Gullah Geechee Cultural Heritage Corridor

[70] Phillips Community Cultural Landscape Technical Report, June 3, 2018.
[71] Clemson provides an explanation of what requires approval from the institutional review board on this website: https://www.clemson.edu/research/compliance/irb/what-review.html
Research projects require IRB approval, but according to the page, oral histories and interviews do not qualify as research.

Commission (GGCHCC) and involved in the conversations and community advocacy in Stoney Community centering around the Highway 278 expansion project. New South Associates provides cultural resource management services and was hired by the SCDOT to create a cultural resource survey of Stoney Community and in doing so, provide recommendations for potential NRHP pursuits. Stoney Community itself expressed a desire to have its TCP eligibility determined, so it became a major source of inspiration for this thesis topic. The author reached out to New South Associates and communicated with Mary Beth Reed, President and also Director of History, and Velma Fann, Historian. Ms. Fann performed the interviews with community members and emailed the interview transcripts of those who gave their consent to use them for educational purposes. To protect the individual privacy of those interviewed, each interviewee is referred to not by name but as Stoney participant 1 or participant 1, etc.

Stoney Community Interview Analysis

The main objective in interpreting the interviews was to glean as much information from them as possible, both in respect to the interviewees' responses as well as the questions posed to them. Because the collected interviews were analyzed after being conducted by another party for project use, the focus of the analysis was to derive information from the answers and stories that help understand how this Gullah Geechee community defines the significance and integrity of their places.

The transcripts were approached using the grounded theory, which takes a both inductive and thematic approach to analysis. Therefore, the interviews were approached

without a prior set of questions, and the analysis and conclusions were drawn from the responses themselves. [72] The first round of analysis consisted of reading through the transcriptions and forming overall themes and impressions. The second round involved reviewing the transcriptions with a more detailed and specific approach, using thematic codes to process the interviews in a substantive way. Each transcript was reviewed and annotated regarding both the specific words, topics, and broader themes discussed by the interviewees. Main themes were drawn out from the interviews and broken down into more specific subthemes like relationships to people or the importance of land ownership. Included in Chapter 5 are the explorations of those themes and subthemes with some quotations and paraphrases to provide concrete examples of constituents' thoughts and opinions.

One challenge in analyzing the interview data is the confidential nature of the information, meaning the full transcripts could not be shared in this thesis. Another method of analysis drew out findings from the data in a more quantitative way. Creating these quantitative values for the qualitative data provided additional evidence and clarity to the interpretation of the words and stories communicated through the interview responses. Stoney Community's dissatisfaction with the initial conclusions from the SCDOT project drove this portion of the analysis, with the question of how the interviews were posed to the community participants. The goal in understanding the percentage of topics discussed by the interviewees was to investigate whether the

[72] David Silverman, Interpreting Qualitative Data: *a Guide to the Principles of Qualitative Research* 4th ed. Los Angeles: Sage, 2011.

questions were community-based, or if they were grounded in the Section 106 approach. Stoney Community expressed interest in framing the historic district area as a TCP, therefore, understanding the extent to which the TCP framework was employed was vital to the analysis of the interviews.

The questions and the responses were analyzed with thematic codes in order to quantitatively determine how frequently the interviewer and interviewees discussed the themes. In order to find patterns in the interview data, the questions and the responses to those questions were divided into five broad categories of questions: broad history, location/boundary/setting, specific places, meaning of community, and finally a set of questions taking the interviewee back 50-60 years. The result for each broad category is a list of topics discussed. Those topics in the questions and responses were counted for frequency. Then percentages were calculated by the number of times a topic was mentioned dived by the total number of frequencies for all topics. The same analysis was then performed for each full interview. The topics for the full interviews are as follows: people, buildings and structures, land ownership, waterways and beaches, and roads. Graphs illustrating the percentages are included in Chapter 5. The percentages for all nine tabulations are included in Appendix B.

Phillips Interview

In addition to the preexisting interviews from Stoney Community, there was an opportunity to interview a member of Phillips Community. Given his work organizing within his community, experience as a spokesperson for Phillips, previous experience

with the College of Charleston's Historic Preservation program, and participation in the GGCHCC, Mr. Richard Habersham was identified as both vital to the conversation and a wealth of information.

The goal of the interview was to ask questions that encouraged answers about significance and integrity from his point of view, and more specifically, the TCP-based integrity of relationship and condition. The questions posed to Mr. Habersham were based on the questions that were posed to the community members in Stoney. Because analysis of those questions had already begun, some of those early conclusions influenced the basis of these questions. There were two main purposes to this interview. The first was to ask questions that prompted responses outlining definitions of both significance and integrity in the eyes of the community leader without using either of those words and without asking in a way that inspired a certain answer. The second purpose was to hear how from his experience and point of view, communities could be better supported when working with preservationists, specifically within the NRHP process.

A phone interview was scheduled for and lasted just under one hour. With the verbal consent of Mr. Habersham, the call was recorded. Like the previously collected interviews, some of Mr. Habersham's sentences and responses are quoted verbatim in the following chapters, but the full transcript is not included so as to protect the privacy of the conversation. The answers to those questions are analyzed in Chapter 5. The questions that pertain to community-based definitions of integrity in particular are emphasized, and quotes from those responses are included in the analysis.

CHAPTER FOUR

A SURVEY OF TRADITIONAL CULTURAL PROPERTIES

Counting the Numbers

This section quantifies the total number of listed TCPs as of early 2021. Because no official list exists through the NPS, there is a chance that there are more TCPs than appear on this list. The NRHP does not contain a TCP "category" per se, so only those properties with the phrase "traditional cultural" or "TCP" in the name are findable on the NRHP's database when searching for TCPs. [73] The Department of the Interior and the NPS website for TCPs or places contains a database of all NRHP listings. There is a downloadable excel spreadsheet of all sites on the NPS website, listed in alphabetical order by state, county, then town. The spreadsheet of all NRHP listed properties is meant to be up to date as of February 2021. [74] This spreadsheet was used to confirm the compiled list of TCPs were still on the NRHP and to provide an overall count for total listed properties and total listed properties in the U.S. According to this list, there are a total of 96,257 places. The table includes the name of the properties as listed, the state, and its cultural affiliation. Many of the TCP addresses and nomination forms are protected and not made public, therefore much of the information is restricted. To prevent misattributing or neglecting an affiliation, the tribal distinction for each listing is not

[73] The list was compiled using an unofficial list from Paul Lusignan, a historian at the NPS, who graciously provided the information he has collected through his experience at the NPS. Paul Lusignan, email correspondence between Will Cook and the author, December 21, 2020.
[74] National Register Database and Research, National Register of Historic Places, *National Park Service*, https://www.nps.gov/subjects/nationalregister/database-research.htm.

included and is instead referred to as having or not having Native American affiliation. To create the maps showing the number and geographic distribution of TCPS, the coordinates provided by the NRHP were used. The coordinates for the address restricted listings are derived from the nearest listed town on the NRHP listed data download. [75]

The following visualization is meant to provide a further understanding of the current scope of TCP listings in comparison to the NRHP as a whole. The maps provide a visual representation of TCPs current geographic and numerical range; therefore, they are not meant for exact locational data.

Total Listings: 96,257
Total TCP Listings: 57
Percentage of TCPs: Less than 0.06%

There are a total of 57 documented TCPs on the NRHP. Gold Strike Canyon/Sugarloaf Mountain exists on the border of Arizona and Nevada and is listed twice. Of those 57, 1 exists in the Federated States of Micronesia while the other 56 are within U.S. states and territories. Of those 57 total listings, 51 of them are listed due to their association with Native American or Indigenous. Almost 90% of all listed TCPs are Native American or Indigenous. The other associated groups were Greek immigrant community, the Cane River Creole People, Latino communities, Czech Americans, Italian Americans, Christian communities, and a ranch or homestead culture. Given that Bulletin 38 was published in 1990, meaning that an average of less than 2 TCPs a year have been recognized on the NRHP since it became available. Just over 0.06% of all

[75] For example, X'unaxi is address restricted. The NPS data lists the town as Juneau, Alaska.

NRHP listings are TCPs, therefore the statements that TCPs are underrepresented and underutilized are more than legitimized. Given the data of total listings on the NRHP, there is justification to those claims that the concept is underrepresented and therefore underutilized in the application of NRHP criteria.

State, Territory, District	Number of Listed Sites	Number of TCPs
Alabama	1330	0
Alaska	437	1
American Samoa	31	1
Arizona	1486	4
Arkansas	2,761	0
California	2905	10
Colorado	1599	0
Connecticut	1640	0
Delaware	717	0
District of Columbia	655	0
Florida	1850	2
Georgia	2175	1
Guam	129	0
Hawaii	366	0
Idaho	1062	1
Illinois	1916	0
Indiana	2011	0
Iowa	2426	0
Kansas	1540	0
Kentucky	3480	0
Louisiana	1488	1
Maine	1656	0
Maryland	1583	0
Massachusetts	4416	1
Michigan	1961	2
Minnesota	1738	2
Mississippi	1483	0
Missouri	2408	0
Montana	1223	3
Nebraska	1135	1
Nevada	386	5
New Hampshire	804	0

State, Territory, District	Number of Listed Sites	Number of TCPs
New Jersey	1764	0
New Mexico	1187	4
New York	6238	2
North Carolina	3051	0
North Dakota	461	0
Northern Mariana Islands	38	0
Ohio	4100	0
Oklahoma	1366	3
Oregon	2075	0
Pennsylvania	3501	0
Puerto Rico	360	0
Rhode Island	809	0
South Carolina	1615	0
South Dakota	1374	2
Tennessee	2181	0
Texas	3416	0
Utah	1875	1
Vermont	872	0
Virginia	3266	0
Washington	1614	7
West Virginia	1075	0
Wisconsin	2524	1
Wyoming	568	2
U.S. Minor Outlying Islands	2	0
U.S. Virgin Islands	91	0
Federated States of Micronesia	26	1

Table 4.1 lists the U.S. states, territories, and districts with listings on the NRHP and the area's number of listed TCPs.

Name	State	Native American Affiliation	Other Group Affiliation
X'unaxi	Alaska	Y	
Turtle & Shark	American Samoa	Y	
I'itoi Mo'o (Montezuma's Head) and 'Oks Daha (Old Woman Sitting)	Arizona	Y	
Gold Strike Canyon (Nevada)/Sugarloaf Mountain (Arizona) (border)	Arizona	Y	
Pascua Cultural Plaza	Arizona	Y	
Chi' chil Bildagoteel Historic District (Oak Flat)	Arizona	Y	
Coso Hot Springs	California	Y	
Helkau Historic District	California	Y	
De-No-To Cultural District	California	Y	
Wiipuk uun'yaw Trail (Desert Path)	California	Y	
Tishawnik	California	Y	
Tahquitz Canyon	California	Y	
Soda Rock (Ch'ichu'yam-bam)	California	Y	
Mus-yeh-sait-neh Village and Cultural landscape Property	California	Y	
Luiseno Ancestral Origin Landscape	California	Y	
Kuchamaa (Tecate Peak)	California	Y	
Tarpon Springs Greektown	Florida	N	Greek Immigrant Community
Council Oak Tree Site on the Hollywood Seminole Indian Reservation	Florida	Y	
New Echota in Calhoun County	Georgia	Y	
Yawwinma	Idaho	Y	
St. Augustine Catholic Church and Cemetery	Louisiana	N	Cane River Creole People

Name	State	Native American Affiliation	Other Group Affiliation
Turners Falls Sacred Ceremonial Hill Site	Massachusetts	Y	
Minog	Michigan	Y	
Rice Bay	Michigan	Y	
Ma-ka Yu-so-ta (Boiling Springs);	Minnesota	Y	
Oȟéyawe--Pilot Knob (Oheyawahi)	Minnesota	Y	
Annashisee Iisaxpuatahcheeaashisee (Medicine Wheel on the Big Horn River)	Montana	Y	
Sleeping Buffalo Rock	Montana	Y	
Medicine Tree Site	Montana	Y	
Pahuk	Nebraska	Y	
Gold Strike Canyon/Sugarloaf Mountain (border)	Nevada	Y	
Spirit Mountain	Nevada	Y	
Cave Rock (de 'ek wadapush)	Nevada	Y	
It-goom-mum teh-weh-weh ush-shah-ish	Nevada	Y	
Toquima Cave	Nevada	Y	
El Cerro Tome Site	New Mexico	N	Catholic, Christian, Latino
Rio Grande and Sand Bar areas of the Pueblo of Sandia	New Mexico	Y	
Zuni Salt Lake and Sanctuary	New Mexico	Y	
Tortugas Pueblo Fiesta of Our Lady of Guadalupe	New Mexico	Y	Latino
Our Lady of Mount Carmel Grotto	New York	N	Roman Catholic; Italian American
Bohemian Hall and Park	New York	N	Czech American
Medicine Bluffs	Oklahoma	Y	

Name	State	Native American Affiliation	Other Group Affiliation
White Eagle Park	Oklahoma	Y	
Bassett Grove Ceremonial Grounds	Oklahoma	Y	
Inyan Kara Mountain	South Dakota	Y	
Bear Butte	South Dakota	Y	
Rainbow Bridge	Utah	Y	
Tamanowas Rock	Washington	Y	
Old Man House Site	Washington	Y	
Doe-Kag-Wats	Washington	Y	
Saint Mary's Mission TCP Historic District	Washington	Y	
Lawetlat'la (Mt. St. Helens)	Washington	Y	
Grave of the Legendary Giantess	Washington	Y	
Snoqualmie Falls	Washington	Y	
Black Hawk Powwow Grounds	Wisconsin	Y	
Medicine Wheel--Medicine Mountain	Wyoming	Y	
Green River Drift Trail Traditional Cultural Property	Wyoming	N	Ranch, farm, homestead culture
Tonnachau Mountain	Federated States of Micronesia	Y	

Table 4.2 Lists the known TCP listings by state, territory, or district, in addition to its cultural association.

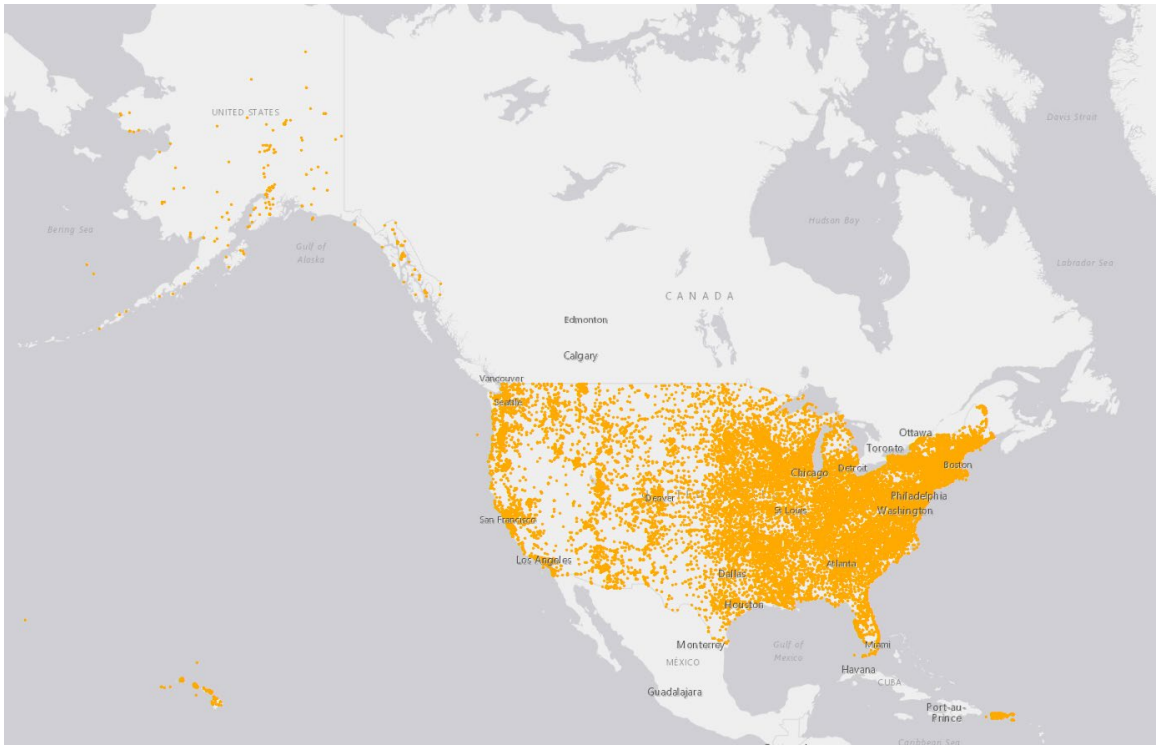

Figure 4.1 shows the NRHP listings in the United States and territories. Made by author.

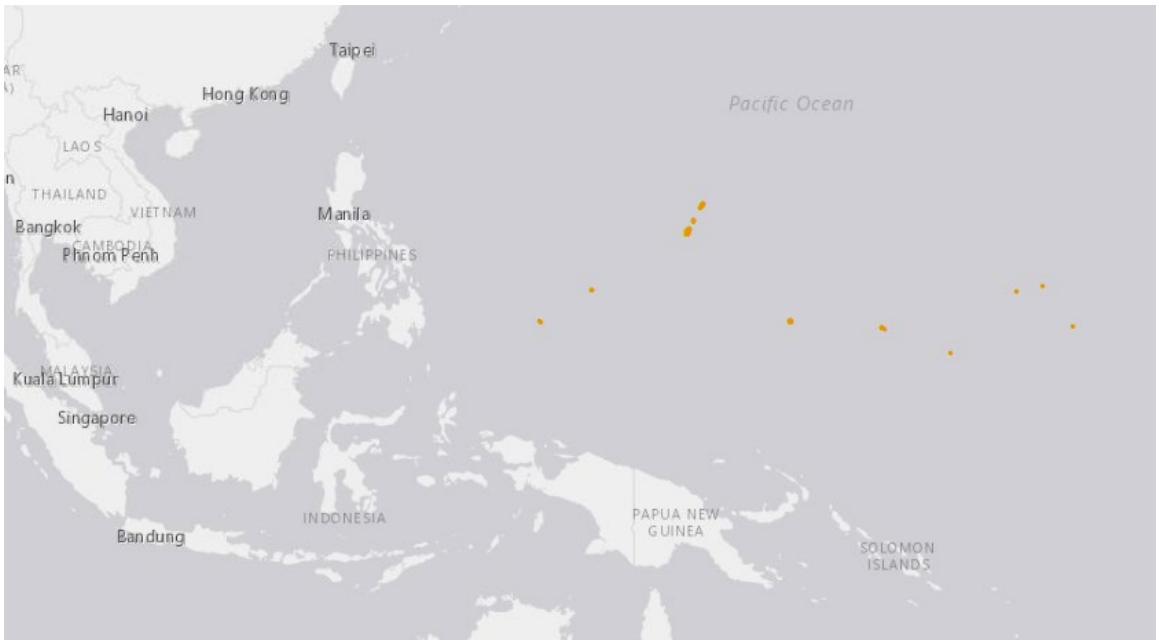

Figure 4.2 shows the NRHP listings in the United States and territories. Made by author.

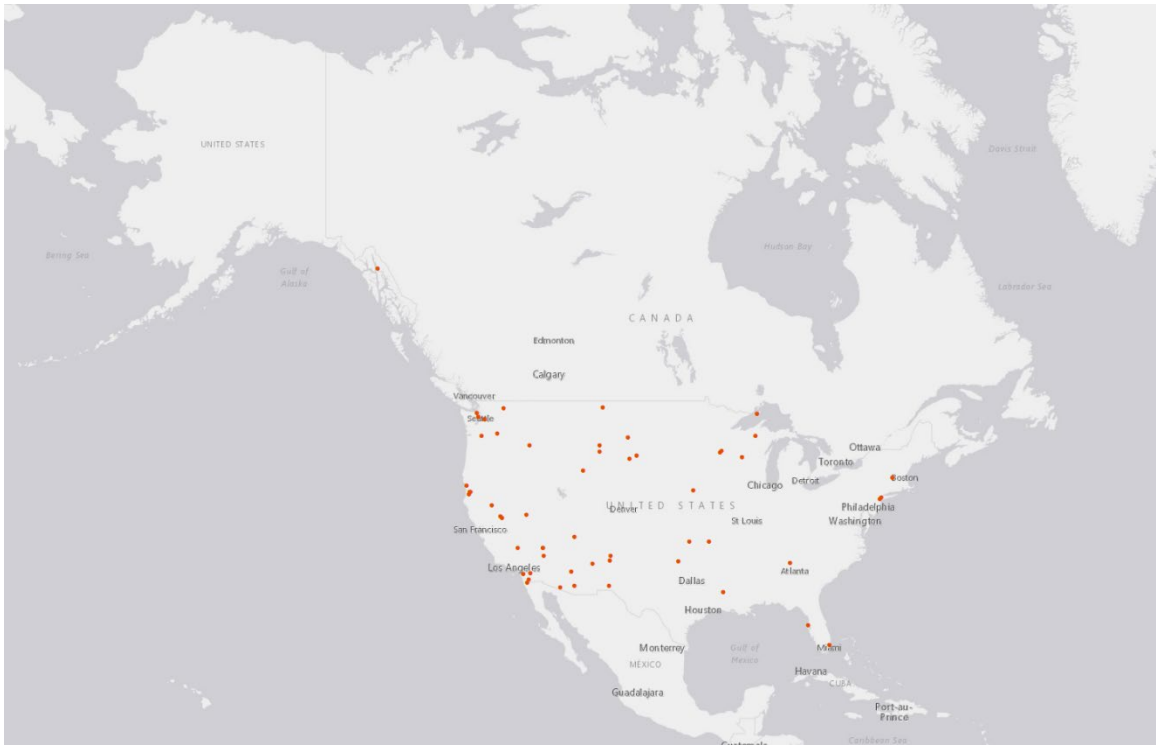

Figure 4.3 shows the total TCP listings in the United States and territories. Made by author.

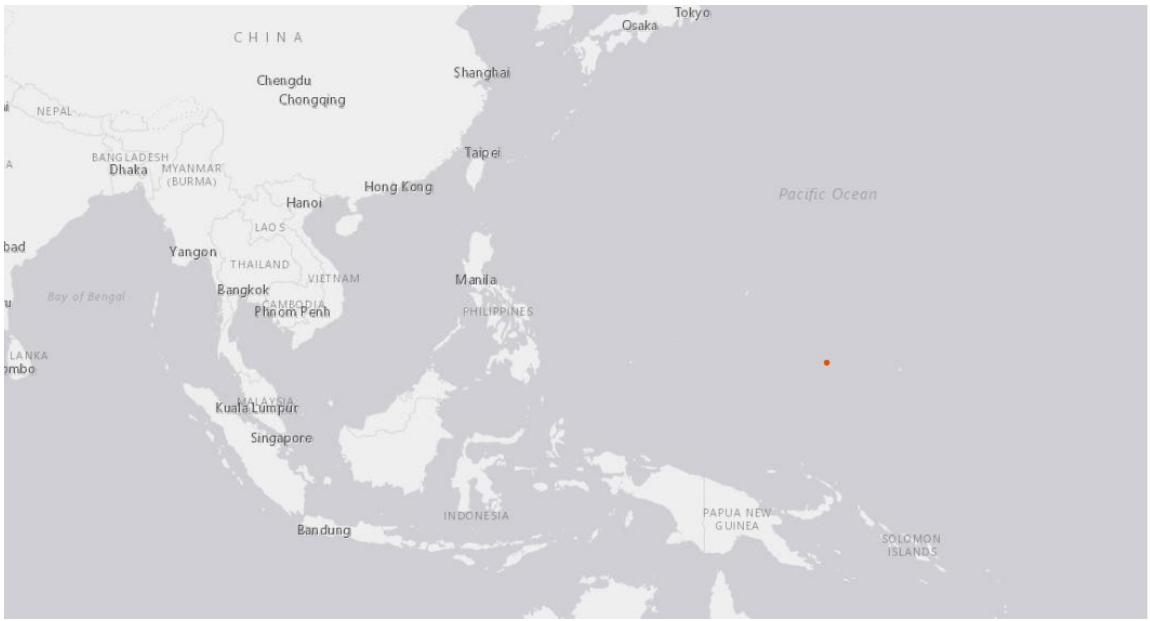

Figure 4.4 shows the total TCP listings in the United States and territories. Made by author.

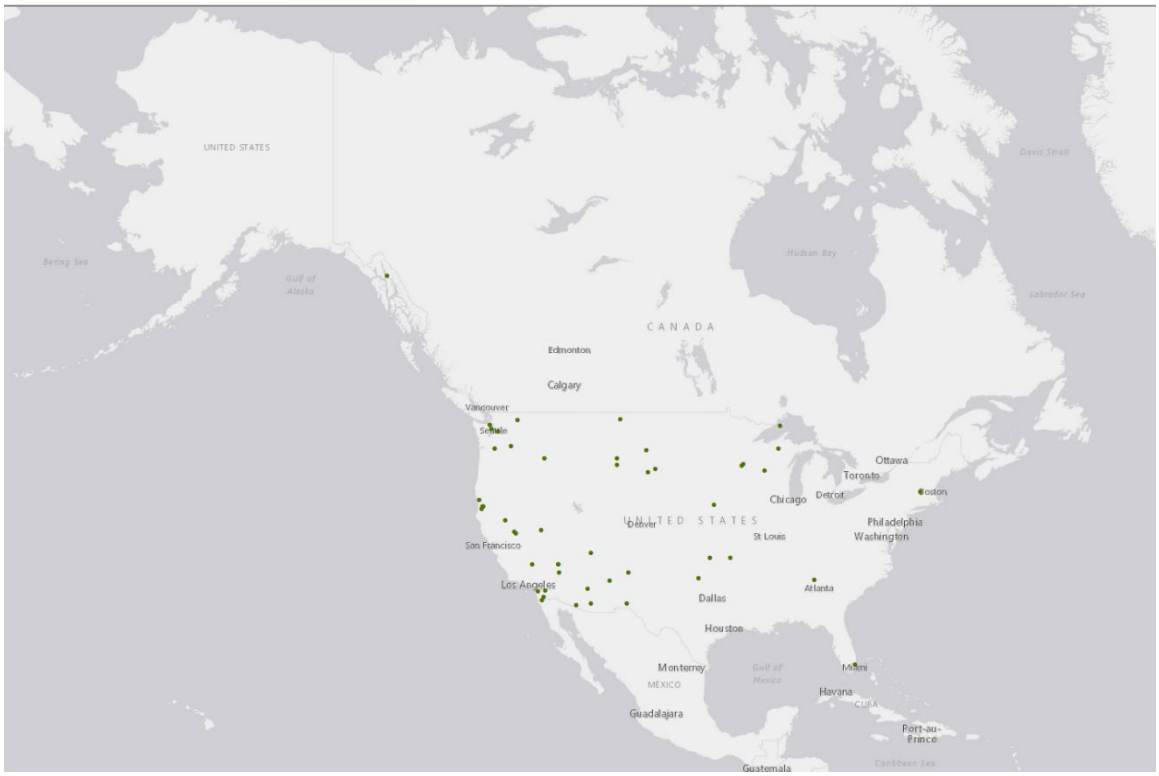

Figure 4.5 shows the total Native or Tribal TCP listings in the United States and territories. Made by author.

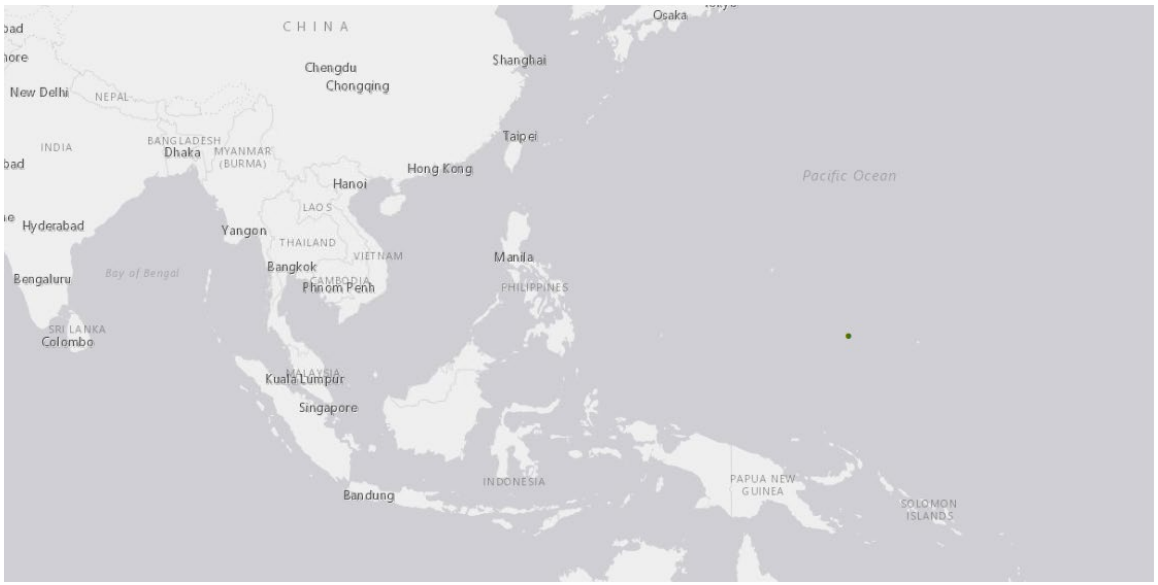

Figure 4.6 shows the total Native or Tribal TCP listings in the United States and territories. Made by author.

Some Considerations

This thesis recognizes that officially being considered eligible for the NRHP can be just as impactful as being formally listed. As King argued, sometimes eligibility can be a more strategic route for certain communities than listings, especially in regard to the application of the protective policies initiated under NEPA and the NHPA. [76] There are surely more properties determined eligible by the NRHP that are also considered TCPs. Properties determined eligible must still follow the standards of criteria that full nominations and listings pursue, and while there may be a comparable number of eligible TCPs as those listed, they are perhaps even more difficult to source and quantify. Therefore, the dataset may be missing some properties and likely does not reflect the full scope of properties that could trigger Section 106 review.

Some properties like Ocmulgee Fields in Georgia or Kootenai Falls Cultural Resource District in Montana are determined eligible as TCPs and are included in the NPS available data download spreadsheet of all eligible properties. [77] Based on the data available online, it is nearly impossible to gather all places that have been determined eligible. Some properties identified as eligible like Devils Tower in Washington do not appear on this spreadsheet. However, because the properties are not classified in the spreadsheets as being a TCP or not, there is no way to know how many TCPs there are based on this data set alone. Another example is Lasso Shrine on the island Tinian in the Commonwealth of the Northern Mariana Islands, (CNMI). A 2010 environmental impact

[76] Definitions of "eligible" and King's thoughts on the determination are included in Chapter 2.
[77] "Data Downloads." National Register of Historic Places, National Park Service.

statement for the Guam and CNMI Military Relocation program through the U.S. Department of the Navy, Lasso Shrine in Tinian was identified as a TCP. The property however does not appear on the NRHP's spreadsheet of DOE's. [78]

It is also important to note that this compilation of TCPs is a working list and should be treated as such. Once again, because there is no simple "checkbox" or category for TCPs on the NRHP, a simple search for TCPs is not possible. There may be some properties that could use the TCP concepts and terminology but are currently unknown to the author. There are very likely properties that could be considered TCPs but are never referred to as such. Additionally, there were some properties found in the research that are not included in the full NRHP list. For example, Chelhtenem or Lily Point in Point Roberts, Washington does not appear in the NPS data download, but is referred to as a TCP by the Whatcom Land Trust. The land trust currently has a conservation easement on the area but the easement's project narrative mentions that Chelhtenem or Lily Point applied to the NRHP as a TCP in 1992. [79]

Considering the likelihood that there are more TCPs recognized by the NRHP, it is important to acknowledge that the list is representative of the range of known TCPs and not a firmly conclusive list. Though there are likely more listed TCPs, it is also likely the number is relatively minimal and does not alter the conclusion that the total number of TCP listings is miniscule in the face of total listings.

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[78] Final Environmental Impact Statement Guam and CNMI Military Relocation, Vol. 3 Chapter 12: Cultural Resources, July 2010. http://www.chamorro.com/docs/Vol_03_Ch12_Cultural_Resources.pdf
[79] "Lily Point Project Narrative," Whatcom Land Trust, *The Bellingham Herald*, https://www.bellinghamherald.com/.

Moving Forward

Even though determinations of eligibility can be just as beneficial as listing a property on the NRHP, limiting this survey to the current range of verified listings provides the national context for this underutilized NRHP approach. It is clear from this analysis that while *Bulletin 38* has existed to provide an avenue to include a broader range of properties for now over 30 years, only 57 TCP listings have successfully used this approach in their nominations. Furthermore, almost 90% of listed TCPs are Native American, leaving ample space for more groups to consider their properties as TCPs.

With a limited number of examples in comparison to the rest of the NRHP, a cycle can take place in which the lack of familiarity with the concept and its application leads to the hesitations against using TCPs, resulting in few total listings. The overall lack of reach may correlate to a lack of familiarity and comfort with the process. However, the shortage of listed TCPs is not an indicator of the capacity of TCPs to serve places and its people but indicates there is only space to expand the tool and the comfort with employing it.

The following chapter examines one way to pursue a TCP listing or determination strategy through Gullah Geechee historic and cultural resources. What follows is an analysis of two Gullah Geechee case studies as identifiable TCPs and how TCP definitions apply within the context of the NRHP. Stoney Community in Hilton Head Island, SC sought and at the time of this thesis, is still seeking recognition as a TCP through the U.S. Highway 278 project. Phillips Community in Mount Pleasant, SC is seeking a historic district nomination but was recognized by the SHPO as a TCP in 2010.

As other Gullah Geechee communities have before them, Stoney and Phillips are both threatened by ongoing efforts to expand the U.S. highways that run through them. Though the communities have explored different advocacy avenues, they have both taken an approach through the NRHP, and there are takeaways from both communities that can provide insight into how TCPs can be employed to other Gullah Geechee places.

CHAPTER FIVE

ASSESSING SIGNIFICANCE AND INTEGRITY THROUGH INTERVIEWS

After exploring the geographic distribution and ethnic associations of TCP listings around the country, this chapter narrows the lens to consider how Gullah Geechee resources have been approached with the existing NRHP framework, and how the TCP framework may provide additional considerations. The case studies of Stoney Community in Hilton Head and Phillips in Mount Pleasant are examples of ongoing preservation issues in places that historically and presently experience the structural transportation-related discrimination and have not received the same attention to conservation of cultural resources. The highway infrastructure that runs directly through neighborhoods has affected and continues to affect the traditionally defined NRHP aspects of integrity. As may be the case with both Stoney and Phillips Communities, communities and cultures may view the significance and integrity of their resources from a different lens than the one the NRHP provides.

Bulletin 38 and the creation of TCPs provide a framework through which Gullah Geechee communities could be evaluated and considered eligible within the NRHP criteria. Because TCPs prioritize a community-based definition of integrity before interpreting the standard NRHP aspects of physical integrity, the TCP framework can provide different evaluative NRHP criteria that would otherwise never deem the communities eligible. One of the hesitations or complications when considering places as a TCPs is the disconnect between the standard NRHP definitions of historical

significance and integrity, and those presented in Bulletin 38 for TCPs. As the Stoney Community interview analysis will address, the questions posed to community members will determine many of the responses to those questions, and it will influence the interpretation of those responses. A predisposition to the NRHP standards will not provide the necessary framework for considering a TCP, which occasionally differs in its evaluative framework. Interpreting the responses through the broader TCP concept may be ineffectual when the questions are guided by a narrow field of questions. In order to bridge that gap between these two sets of definitions, there must be an understanding first of how the traditional culture in question defines and demonstrates historical significance and integrity. The foundational component of TCPs is the evaluation of those two criteria from a community-based approach, therefore this chapter analyzes interview data from community members to draw out their community based definitions of significance and integrity.

The chapter is broken into three main sections. The first section investigates the interviews with Stoney Community members from the ongoing U.S. Highway 278 project, contextualizes the questions and answers, and from them derives community-based definitions of significance and integrity. The second section discusses the author's interview with Phillips Community historian Mr. Richard Habersham, in which the answered questions pertaining to his definitions of significance and integrity. Finally, there is a comparison of findings between the two communities' interviews, particularly in the interpretation of integrity of condition and the cyclical nature of the highway infrastructure that impacts physical integrity.

Stoney Interview Findings and Analysis

The questions posed to the members in Stoney were not exactly the same across each interview, but they did all follow a similar pattern of pursuing the standard NRHP seven aspects of integrity. The total amount of questions ranged from 19 to 31 for each interview. After removing questions about spelling or asking an interviewee to repeat a statement, the total number of planned questions and follow-up questions ranged from 16 to 28. Some basic introductory questions were posed, questions about the setting and the delineation between Stoney and the other Gullah Geechee communities on the island also followed. They also questioned how the houses were arranged in the neighborhood, both in relation to each other and to the roads. Following those questions about location, setting, and design there was a question about how the communities looked different from about 50 years to now. Based on the responses, there were some follow up questions including the jobs people had before and after the bridge, farming and fishing practices, and information about the stores mentioned. As the methodology in Chapter 3 stated, the questions and the responses to those questions were divided by broad category, then coded for frequency of topics discussed. Below is a presentation of the data and an analysis for each category.

50-60 Years Ago

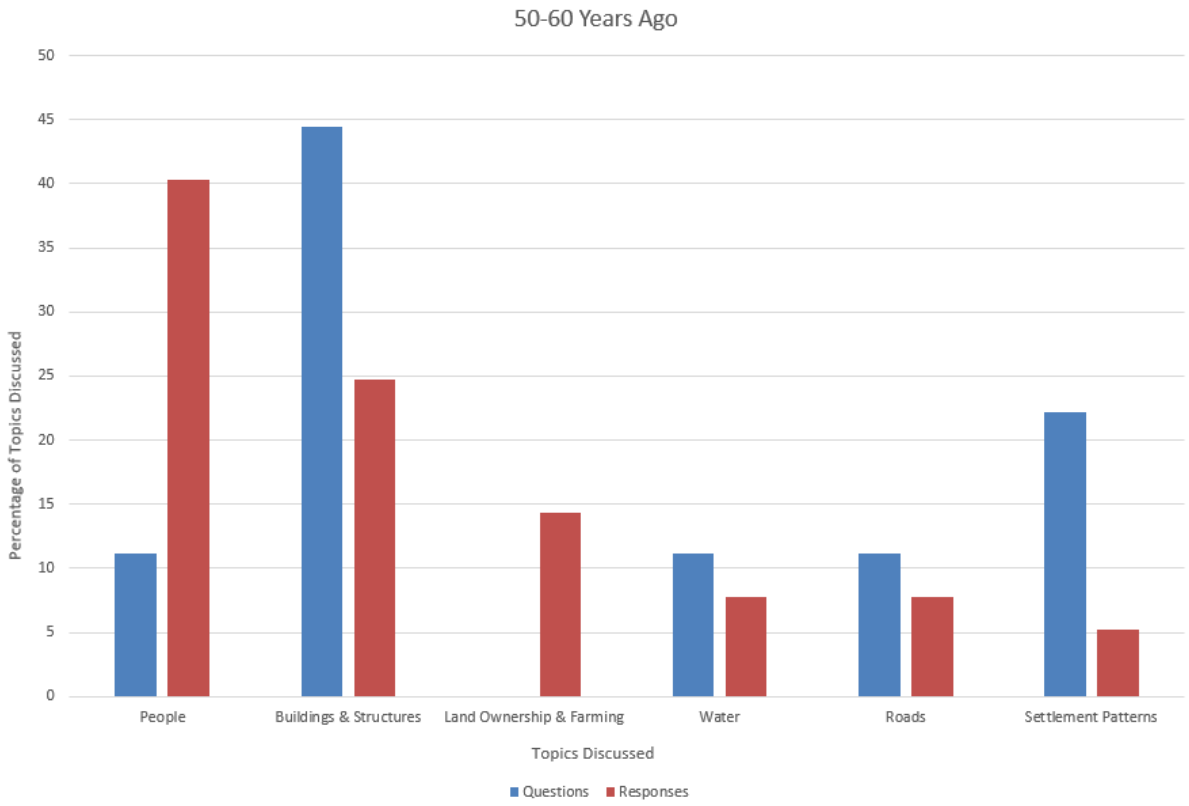

Figure 5.1 shows the percentages of topics discussed following the "50-60 years ago" question.

The one question posed to each interviewee at the top of the conversation was a variation of this sentence: "If we were to travel back 50, 60 years, what would the community of Stoney or the island look like?" At times that question was accompanied by specific questions about the physical characteristics of the community like the houses, the settlement patterns, or how families were grouped together. In the four questions, 44.44% of the topics addressed buildings specifically, either asking about buildings in general or asking about churches or stores. The responses to those questions however only mentioned buildings or structures such as docks 25.68% of the time. Similarly, the

questions in this category asked specifically about settlement patterns in about 22% of the question topics, to which the interviewees only addressed in about 5% of their answers.[80]

Broad History

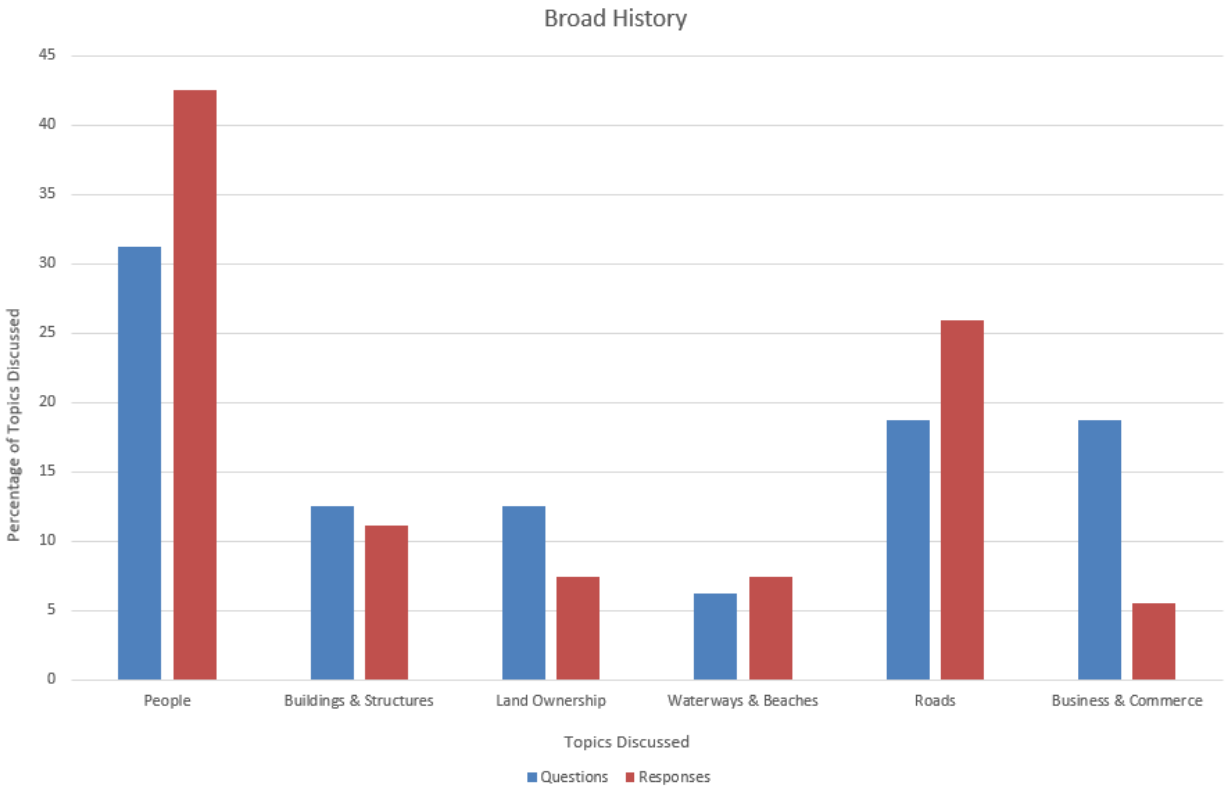

Figure 5.2 shows the percentages of topics discussed with "broad history" questions.

Some of the results from this category yielded a similar focus on topics in the questions and responses. Buildings & structures, and waterways & beaches were discussed at similar proportions amongst the questions and responses. One key highlight in this category was the difference in focus on the businesses and commerce that existed

[80] To clarify, the interviewer did use the phrase "settlement patterns" in several questions across three of the interviews.

in the community; 18.75% of the question topics centered around businesses whereas less than 6% of the responses pertained to the businesses.

Location, Boundary, Setting

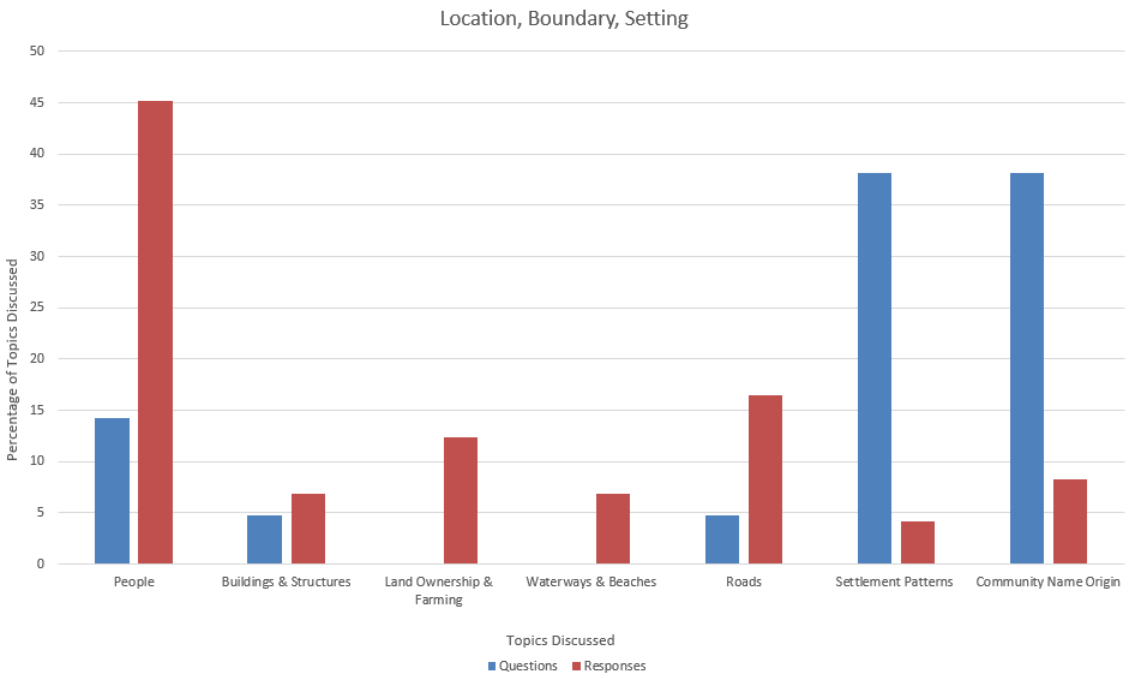

Figure 5.3 shows the percentages of topics discussed with "location, boundary, setting" questions.

Within this category, questions focused significantly more on the settlement patterns and the boundaries or distinctions between the different neighborhoods on Hilton Head. Almost 40% of the topics in the questions were about settlement patterns whereas just over 8% of the responses addressed the topic. Though some questions pertained to the settlement patterns, many of the responses instead focused on the legacy of land ownership rather than the spatial configuration of the properties. While about 14% of the question topics pertained to people and relationships in the community, almost 45% of the topics discussed by the interviewees were people in the community.

Specific Places

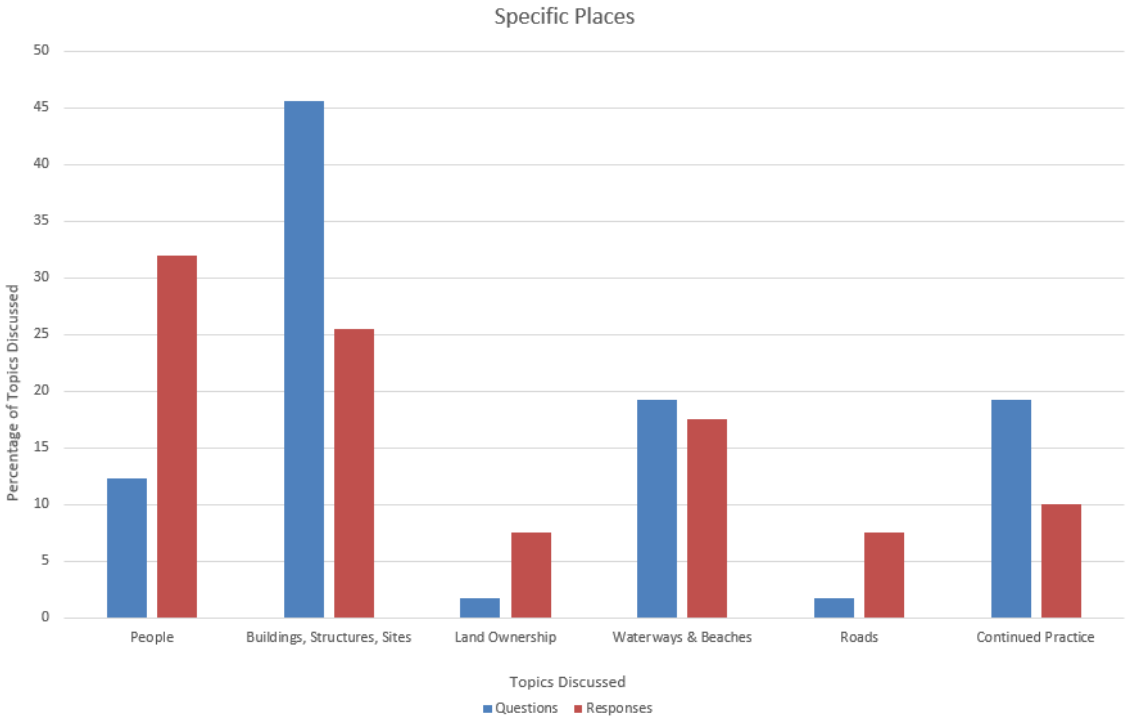

Figure 5.4 shows the percentages of topics discussed with questions about specific places.

Despite the over 45% of mentions as buildings, structures, and sites in the questions, only about 25% of the topics in the responses were the same category. About another 19% of the question topics were about the continued practice or use of a place, for example asking if a building was still standing or if people were still fishing in the same location. However, the responses were again mostly mentioning the people in the neighborhood and the people who inhabited the locations, rather than the buildings themselves. This category did yield the highest percentage of buildings & structures mentioned, however this could be due to the high proportion in the questions.

Community Meaning & Connection

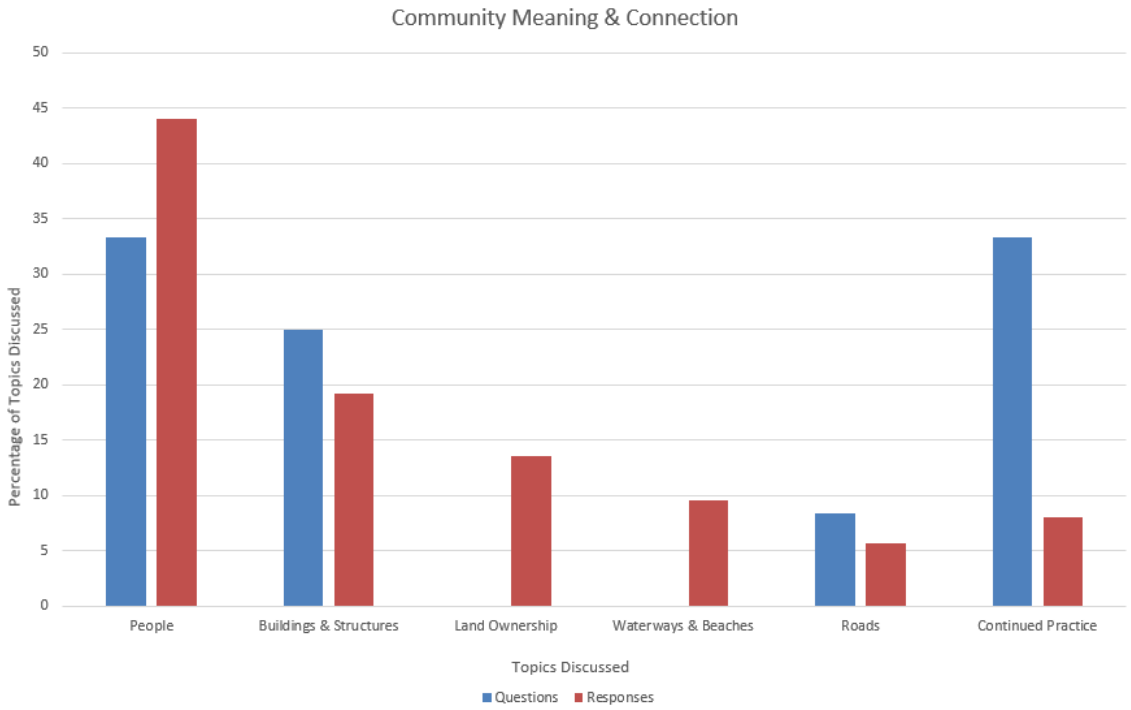

Figure 5.5 shows the percentages of topics discussed with questions about community meaning & connection.

In the questions about community meaning and value, the questions focused equally on people and themes of continued practice in the community. The questions relating to continued practice were centered on the tangible (for example, if community members continued to make bateaus (small boats) today), or intangible (for example, whether a community value was passed down generation to generation). The responses were more varied in the main topics, the most frequent topic being people. Some topics like land ownership and waterways & beaches came about in the responses despite not being mentioned in the questions.

Interpreting the Questions

Though not necessarily intentional, there is an immediate assumption that change has occurred, and that the island or community does indeed look very different to its past image. Notably this question was also the first posed in each interview, creating an emphasis on what historic buildings, structures, patterns are still physically intact as they were at least 50 years ago. While the endurance of those historic buildings and structures may indeed be meaningful to the community members, the principal question assigns value to the physical continuation of those places before the interviewees have elected to give that concept the same value.

Almost all of the questions appear to be arriving at one or more of the NRHP's seven aspects of integrity. Under the standards outlined in the NRHP, a place must be able to convey its significance through historic integrity, which is explicitly grounded in the physicality of the property. [81] In addition to that initial question about traveling back, there were often follow up questions investigating whether certain structures, buildings, and landscape features were "still standing" or not. This line of questioning is understandable considering the emphasis on the built environment through the NRHP's policy and process. New South's objective in the project was to evaluate the community as a historic district, so it is justified in gaining as much understanding of how the community reflects the NRHP integrity standards.

[81] National Register Bulletin 15, "How to Apply the National Register Criteria for Evaluation," National Register Bulletin, U.S. Department of the Interior, 1995. https://www.nps.gov/subjects/nationalregister/upload/NRB-15_web508.pdf

However, because Stoney was also being considered as a TCP, it is important to acknowledge the TCP considerations made about the seven aspects of integrity and acknowledge its prioritization of integrity of relationship and condition. While still acknowledging the importance of those physical components, Bulletin 38 states "A property may retain its traditional cultural significance even though it has been substantially modified, however. Cultural values are dynamic, and can sometimes accommodate a good deal of change." [82] Some of the questions do get at these two additional integrity considerations, including those asking how the interviewees define their community or what community means to them. Some of the other questions are seeking to answer the current relationship by asking if the community members still use or occupy certain places like the beaches, fishing docks, and praise houses. The disjuncture in the question again arrives at the emphasis on the built environment and how it has changed rather than an emphasis on the relationship and condition present in the neighborhood and community members.

All questions except for certain follow up questions regarding spelling or repeating a phrase could be sorted into these broad categories and topics. Given the prevalence of topics like buildings & structures, commerce, settlement patterns, or the connection to Hilton Head Island, the topics seem targeted. If the responses did not echo a similar emphasis of the topic, the conclusion is then a loss of integrity.

[82] Bulletin 38, 10.

Initial Findings and Conclusions from New South

The initial survey examined Stoney Community as a TCP and as a historic district, and New South Associates initially concluded that Stoney was not eligible for evaluation as either. They believed Stoney could not be considered as a TCP due to poor integrity given the loss of historic resources and the inability to convey significance with cultural beliefs or practices, and they provided three main areas to support this conclusion. The historic farms that provided food for families and sale are now overgrown or developed for different purposes. They found the oral interviews to demonstrate the commercial importance within Stoney and the island as a whole, however, they found Stoney to be lacking in institutional properties or culturally significant gathering places that are relevant in other Hilton Head neighborhoods. They also concluded Stoney could not convey an association with continuing traditional beliefs and practices given the out-migration of young adults in the late 20th century. The initial report did attribute much of the loss of physical fabric in the community to the vast changes brought by the original construction of the highway, the subsequent expansions, and the years of development on the island that followed the highway's path. [83]

The initial findings also recommended Stoney Community as not eligible in the NRHP as a historic district given a cumulative loss of integrity in all seven categories. They attributed this loss to the loss of historic properties, non-historic infill development, and the successive highway widenings. The firm also included a list of several

[83] New South Associates, "Research Study of the Historic Stoney Community," New South Associates Technical Report, 2010, 51-68.

preservation recommendations for the community moving forward. They recommended reducing the district area boundary to have a greater potential as a historic district through the NRHP, consisting of Little Stoney, Green's Shell Enclosure, and the Amelia White Cemetery. They also recommended the community revisit the plans outlined in Hilton Head Island's Gullah Geechee Land and Cultural Preservation Task Force with an emphasis on developing heritage tourism, obtaining legal aid for heirs' property, revising zoning codes, and interpreting and preserving Gullah Geechee cultural resources. [84]

Response to the Stoney Project

After the oral histories were collected for the Highway 278 project, the preservation firm's initial findings concluded that Stoney Community could not be considered as a historic district. Following the initial findings, there was a comment period involving the community, SCDOT, New South, and the Gullah Geechee Cultural Heritage Corridor Commission (GGCHCC). After the findings, Heather Hodges, the Executive Director of the GGCHCC submitted a letter to the SCDOT offering questions and comments to the report prepared by New South for the U.S. Highway 278 project.

There were two issues with the conclusion that Stoney did not have enough culturally significant places. The entire island of Hilton Head was identified by the NPS as a cultural landscape, therefore, Stoney is significant within the larger cultural landscape. The second concern from the first finding was the idea that because Stoney was a commercial center, there were no culturally significant places in the area. They worry that because the survey defined Stoney as a commercial center, the survey also

[84] Ibid.

limited the significance to only being commercial. They questioned if the agency was limiting its definitions of cultural expression to the built environment with more clearly defined functions such as churches or cemeteries. This ultimately led the GGCHCC to wonder if the interviews began with the preconceived notion that Stoney was only a commercial center and that the commercial nature of the community was not culturally significant. [85]

Secondly, the GGCHCC contested the idea that the younger generation's out-migration caused a cultural rupture that rendered the community unable to transmit cultural traditions. The comments do acknowledge that some of the Native Islanders did leave the community for different opportunities but maintain that a considerable amount of Native Islanders do still reside in the community and on the island. They felt that it was an exaggeration to assert that the migration had severely cut the cultural ties in the community.

The third comment was in response to the report's finding that there was a lack of integrity given the history of the highway widenings, infill development, and some demolitions of historic properties throughout the study area. The comment in return argued against that statement, highlighting the ways in which marginalized communities have experienced a higher amount of loss caused by highway installation, gentrification, and new development. The GGCHCC were concerned with the initial conclusions of a lack of integrity, and the response letter illustrated the differences between the two interpretations. Ultimately the question raised of whether the interviews were conducted

[85] Correspondence between Heather Hodges, then Director of the Gullah Geechee Cultural Heritage Corridor Commission, and the South Carolina Department of Transportation, 2020.

with certain preconceived notions begs the question of how the interviewees responses could be interpreted through their perspective instead. [86]

In addition to the comments from the GGCHCC, the questions in the four interviews with Stoney Community members seemed to have approached the concepts of integrity and significance from the position of the NRHP standard criteria rather than the more community-based TCP approach. After the initial conclusions, some of the interview questions seemed to have positioned the integrity of condition on certain features of the built environment like buildings and structures that may or may not have held the same importance to the community members. When the questions focus on the significance of the commercial history of the neighborhood, then inquire about the physical integrity of those businesses and stores, the responses and the conclusions from those questions may yield a certain answer. As the GGCHCC comments outlined, the interviews may have also predicated the existence and continuation of the community on the number of community members who moved away, which can be a precarious position to take considering the community members subsequently contested otherwise. When taking the Bulletin 38 process into account, a TCP lens should consider the property or district in question through a community based approach first before applying other NRHP standards. In doing so, the final interpretation could yield a different result. In order to produce this potential, the interview responses were then analyzed to understand how the community members expressed significance and integrity through their interviews.

[86] Ibid.

Community-Based Approach to Analysis

Presentation of Interview Topics

The four community members who consented to share their interviews were interviewed in conjunction with the US 278 Highway Project by Velma Fann of New South Associates. As stated in Chapter 3, the full transcripts are not included in this publication in order to guarantee the privacy of the participants in the oral history and interview collection for the U.S. 278 Highway Project. In lieu of the transcripts, the following is an overall summary of the participants' background information, as well as a summary of the conversations' various topics and themes.

Participants 1, 2, and 3 were interviewed in early November 2020. Participant 4 was interviewed in March 2020. The interviews were conducted over the phone and later transcribed. The interviews lasted between 30 minutes and 1 hour, with prepared questions and follow up questions totaling between 14 and 21. All four participants are Native Islanders who still live in Hilton Head today. The interview questions were either similar or identical for each participant, therefore the responses demonstrated many similarities. The participants' responses included, but were not limited to, the following: the appearance of the community and how it has changed over the last 50 years, Stoney's relationship with the rest of the island, the most important places in the community, and more generally the most important characteristics of the community. Each person interviewed also expressed concerns about the potential damage the highway expansion would cause the community.

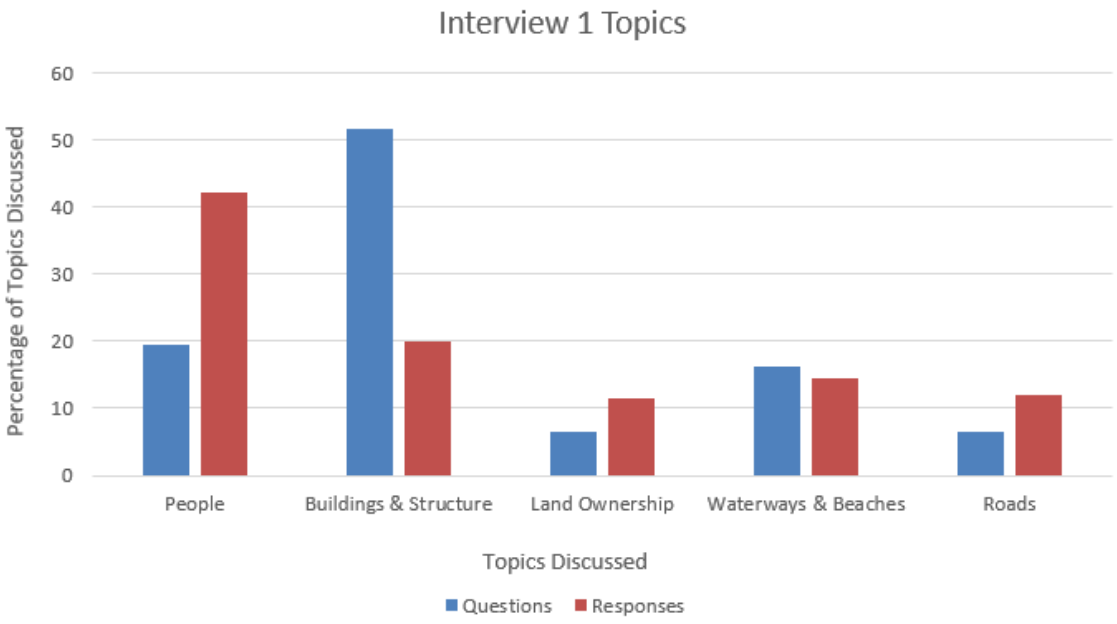

Figure 5.6 shows the percentages of topics discussed in Interview 1.

Interviewee 1 discussed the topic of people at a percentage of over 40% whereas the questions focused at a percentage of over 19%. Over 50% of the question topics pertained to buildings & structures in comparison to the almost 20% of the responses. The other three topics were less numerous, though it is important to note that the topics of land ownership and roads were mentioned twice as frequently in the responses than in the questions.

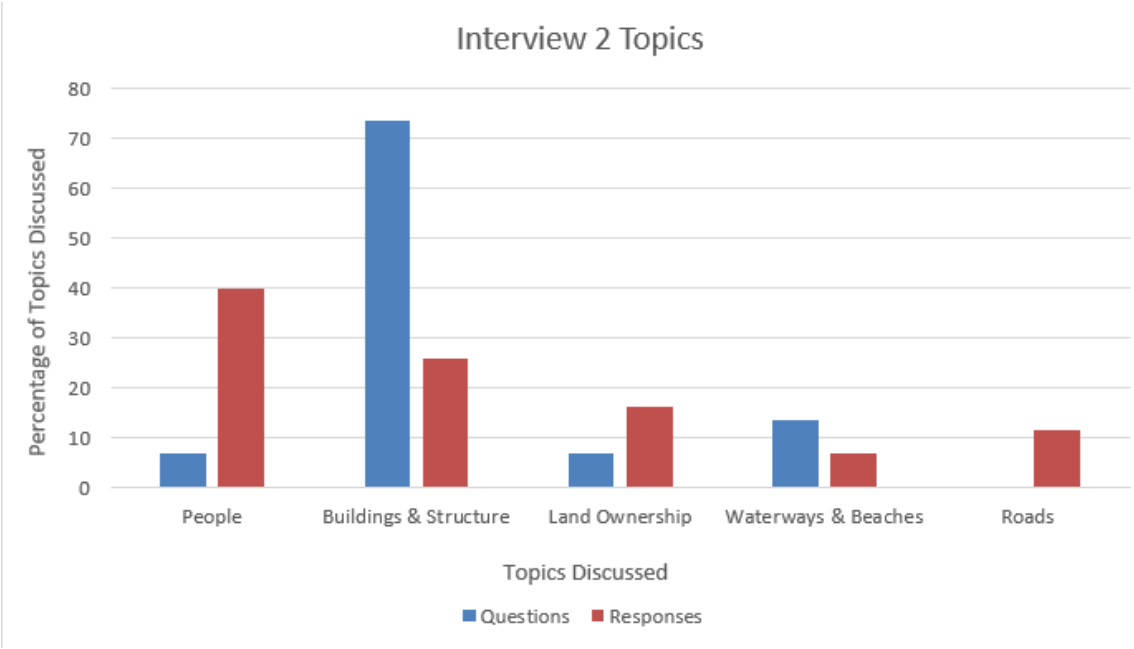

Figure 5.7 shows the percentages of topics discussed in Interview 2.

In interview 2, the questions focused heavily on buildings & structures at over 73% despite the responses of over 25%. This participant spoke more frequently about people in the neighborhood and the relationships amongst community members at almost 40% of the conversation topics, whereas the questions about people were at less than 7%. This participant also spoke more about land ownership and the roads in the community than the interviewer referenced.

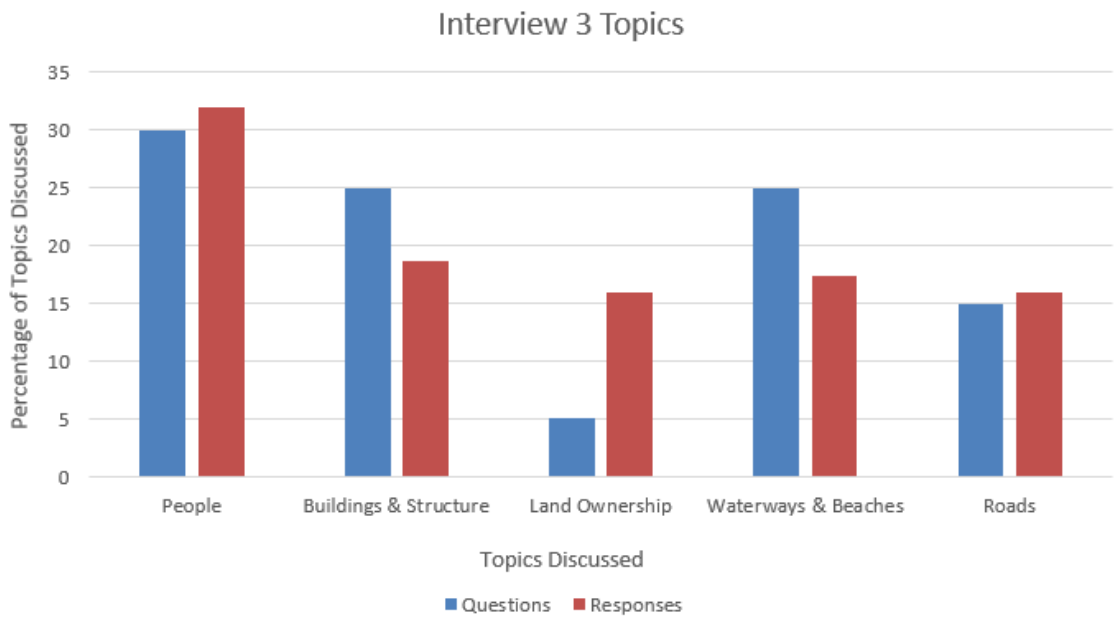

Figure 5.8 shows the percentages of topics discussed in Interview 3.

Interview 3 had a more even distribution between the questions and responses on the percentage of people discussed, at 30% and 32% respectively. The difference between the emphasis on buildings & structures was also smaller in this interview with the question topics at 25% and the response topics at over 18%. The focus on waterways was similar at 25% of the question topics and over 17% of the response topics. Mentions of roads was almost the same at 15% for questions and 16% for responses. The last to note is the theme of land ownership, which was 5% of the question themes but comprised 16% of the response themes.

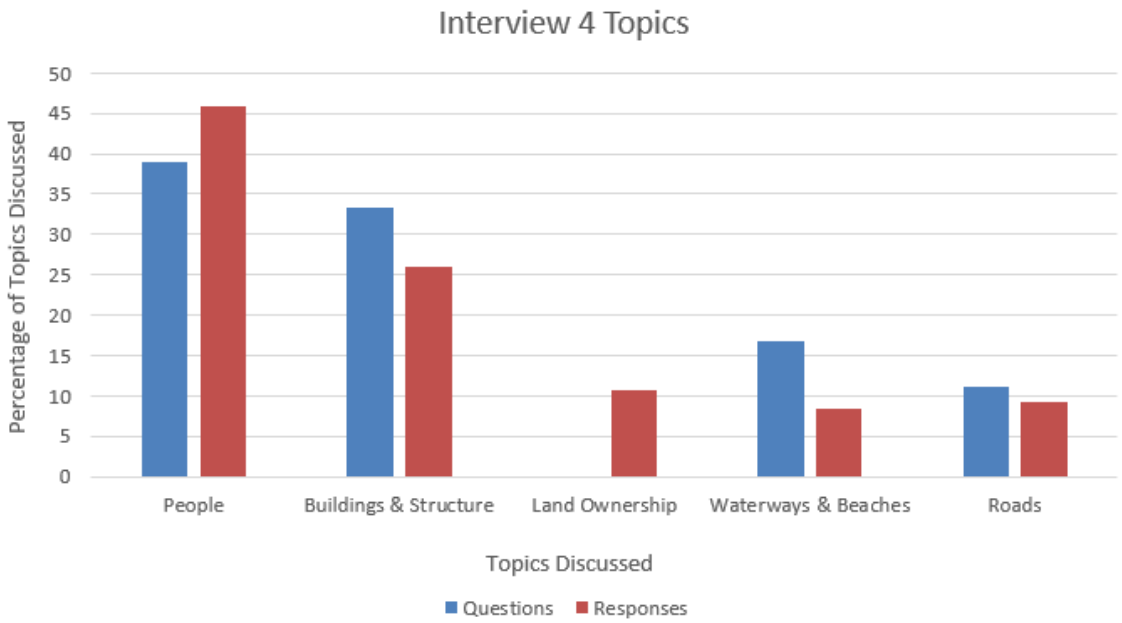

Figure 5.9 shows the percentages of topics discussed in Interview 4.

Interview 4 also before had less of a difference between the percentages in the topics of people at almost 39% for the questions and over 45% for the responses. Additionally, the percentages for the buildings & structures topic were at 33% for the questions and almost 26% in the responses. The topic of waterways appeared twice as frequently in the questions rather than the responses at 16% and 8%, respectively. Land ownership was not brought up in the questions yet consisted of over 10% of the topics this participant discussed.

Frequent Words in Interview Responses

Each interviewee's responses were sorted through a word counter to count the most spoken words. After removing certain articles, common verbs, and stopwords, many of the most frequently spoken words were similar across the different interviews. [87] Some of the most commonly used words either refer specifically or are centered around themes of people, relationships, and land. [88] Three of the participants' most common word was "people" while it was the third most said word for the other participant. Other words like "family," "families," or "grandfather" were also very predominant in the documents, in addition to the names of family members mentioned throughout. The other most common nouns pertain to the places and the landscape in the neighborhood. Some of those words include "houses," "neighborhood," "community," and "children." Others related more clearly to the physicality of the place like "walk," "creek," or "school." Other common words related to experiences and intangible elements like "value," "time," "years," and "Gullah." The table including the most frequent words in each interview is included in the following pages.

[87] The following words were often removed from the text: the, and, that, that's, go, going, would, okay, yeah.
[88] "Hilton," "Head," and "Stoney" were also very common words and included in the count, but they are not included in the text analysis.

Participant 1	
Word	Frequency
people	57
stoney	26
family/families	24
area	19
boat(s)	17
hilton head	16
store	16
island	15
years	13
land	12
fish	11
building	9
creek	9
still	9
road	8
baskets	7
oyster	6
book	6
owned	6
highway	6
property	6

Participant 2	
Word	Frequency
land	32
hilton head	25
house(s)	23
store	22
people	21
island	16
road	12
community	11
gullah	11
children	10
school	9
water	9
building	8
family	8
stoney	8
creek	7
owned	6
built	6
boat	6
name	6
area	6
money	6

Participant 3	
Word	Frequency
neighborhood(s)	22
people	20
stoney	19
church(es)	17
important	11
now	10
beach	9
family/families	9
horse	9
service	9
plantation	8
land	7
walk	7
same	6
culture	5
everybody	5
gullah	5
prayer	5

Participant 4	
Word	Frequency
stoney	60
area	32
people	30
family	22
still	21
grandfather	18
store(s)	18
years	14
now	13
hilton head	11
value	9
community	8
church	6
fishing	6
grocery	6
lane	6
women	6
business	5
christmas	5
education	5
home	5
men	5
road	5
school	5

Table 5.1 shows the most frequently spoken words in participants' responses after stopwords and common words were removed.

Interview Findings

The predominant themes throughout the four interviews are the relationships in the community and between the community members, the people associated with the specific stores and locations in the community, land as property, and the importance of the creeks for economic, recreational, and religious spaces.

All four participants spoke about many of the people that they associate with the community, both people they still interact with today and people they remember from the community. Each also emphasized the importance of the people in the community throughout their responses, both explicitly and implicitly through their histories. As participant 2 said, they are the "Keeper of Gullah culture" and "keeping Gullah culture alive." The names of different people and families were logged in a separate spreadsheet and counted as there was some overlap across the interviews. In total there were over 26 individual people and families referenced from the neighborhood and the island. Participant 1 mentioned the most in their interview, referencing over 13 different individuals or families.

The importance of the people, the community itself was stressed by each of the interviewees at least once during their conversations, not only through their stories but more directly too. One of the final questions asked in the fourth interview and the answers summarize the emphasis made on people and relationships:

Q - “If we lose ‘blank’, we lose a lot of Stoney. What would you put in the blank?”
A - “Difficult question. That is difficult.”
Q - “You can say I will always remember blank about Stoney”
A - “It’s just the people. It’s the people. It’s what Stoney stood for. Stoney stood for community. I would hope that you never really lose how Stoney stood for everybody. Stoney stood for family. Stoney stood for survival.”

The connections between places and people or family frequently appeared in the interviewees’ responses. The different places and locations mentioned throughout the interviews were also counted, with over 35 references. Given that several of the questions centered around the importance of business and commerce, each interviewee did at the very least mention the different stores they remember from growing up and the stores that stand today. As already mentioned, the interviewees described the stores largely in relation to the people who owned and operated them rather than the products sold or the appearance of the building. Almost every place or location in Stoney had an association with a person or a family. While they described the type of store, the building, what the store sold, each store was connected to one person or one family. The participants frequently referred to the business as a person’s store; for example, participant 1 mentioning that the Robinson family had a store even before Drayton’s store.

In addition to the connections to people, the participants also discussed their perceptions of the neighborhood and the natural landscape from childhood to present day. Land ownership was a main theme throughout the interviews. With the exception of the broad history category, land ownership appeared more frequently in the responses than it did in the questions. In three of the question categories, the concept of land ownership

appeared in the discussion despite there being zero questions on the subject. [89] For example, in the questions about community meaning and connection, almost 15% of the messages communicated revolved around the concept of land ownership. The topic of land ownership did appear in three out of the four interviews, though each interview demonstrated a greater emphasis on the topic in the responses than the questions. Participants 3 and 4 in particular highlight this occurrence. [90] Participant 4 said "You do your thing. That's your business, your land at your backdoor." Participant 3 said "Land was the only thing we had, and it was important because it was a really important resource. You planted the land, you lived on the land. And so land was important for living."

This participant also spoke about the culture of self-sufficiency through that use of land ownership. When asked how people earned a living before and after the bridge, Participant 3 stated the neighborhoods in Hilton Head were "self-sustaining" because they "planted what they needed to eat, went into the river to get the seafood," selling surplus produce and seafood for small amounts of cash. Like the land, the waterways and the creeks were also sources of sustenance. As Participant 3 introduced themselves, they "grew up fishing and farming." Participant 1 spoke about the sailing trips people would take to sell fish in Savannah. They and Participant 2 discussed the bateaus people would take in the creeks. Bateaus are flat, wood-bottomed boats used mostly through the creeks and inlets, which one would around Stoney today according to Participant 2. This participant also mentioned the creeks and the bateaus have another layer to their meaning

[89] See figures 5.1, 5.3, and 5.5.
[90] See figures 5.8 and 5.9.

because the ancestors of Stoney escaped from their plantations in bateaus and rowed until they reached Hilton Head.

The reverence for Skull Creek and Broad Creek seen in the history of the community is also demonstrated through the relationship with the different community churches. Participants 1 and 4 both spoke about the history of baptisms some churches performed in the two main creeks, and while some of those churches have a baptismal pool now, some congregation members and one of the churches actively perform baptisms in the creek to this day. First African Baptist Church performed baptisms in the marshland area at the meeting of the two creeks. Participant 4 also indicated that the most recent baptism was in Skull Creek with the Mount Calvary Baptist Church. The final type of physical setting that the interviewees discussed was the churches themselves. One participant said that growing up, the churches would rotate, there were several worship houses and most people in a group would rotate between the churches. The constant was the congregation not the building, meaning the importance was worshipping with the group rather than worshipping in a specific location.

How Participants Communicate Significance & Integrity

In the case of regarding a place as a TCP, it is helpful to first understand how a community defines historical significance before viewing the place through the lens of NRHP evaluative criteria. To summarize the themes of significance from the interview findings, there are several themes through the topics that the interviewees expressed. One key theme was the importance of land ownership during the past and the present, and the

retention of that family land. Reflected in the importance of land ownership and showcased throughout the interviews was the retention and continuation of the legacy the ancestors envisioned and created for their descendants. Each of the interviewees expressed how they still value and benefit from their greater plan through various stories about the founding of the area, the stories of childhood with grandparents and great grandparents, and as a connection that motivates their relationship with the area to this day. Participant 2 in addition to the story about the role the bateau played in the escape to freedom and formation of Hilton Head said "our people was determined and they had a vision: they wanted to be free." Later in the interview, they had this to say about the importance of living on the land through the past, the present, and the future:

> "It means the world to me, and there is no price tag on my land, no price tag at all, because I want it to be passed on to the next generation and the next and the next. I have four children, five grandchildren, and five great-grandchildren. I want my land to be here so their children and their children's children will be able to stand, build, appreciate, sing, shout, dance and whatever on this piece of land that was purchased by their ancestors way back when. That's what it means to me."

While Stoney was not an entirely commercial area, the commercial nature of the area is still an integral component of its history and the experiences people had in the area. Until more modern history, Stoney served as the commercial area for the rest of the Gullah communities on Hilton Head Island given its location on the creeks and its proximity to the mainland. As the interviewees say, Stoney was and still is the first thing you see on Hilton Head and the last thing you see when you leave. The goods and services that Stoney provided allowed the traditional culture of the whole island to thrive and served as a figurative center of the island culture. As participant 4 stated, "Stoney has

always been an intricate part to the island." In other words, Stoney had an impact not only on those people born and raised within the neighborhood but also had an impact on the entire Gullah community and culture on the island.

In the case of Stoney Community like other Gullah Geechee communities, the argument for significance could be made under Criterion A: Association with events that have made a significant contribution to the broad patterns of our history. As Bulletin 38 points out, the "our" in the standards can refer to the traditional culture in question in addition to even larger groups or regions in history. Similarly, the "events" can include specific events in history but as it says, but it can also represent broad patterns or themes in the culture's history. [91] All of these themes of significance can be applied to significant broad patterns of history both in Stoney and in the Gullah population on Hilton Head island. These cultural patterns shared through history allude to those aspects of culture outlined in the GGCHCC management plan. These aspects include the connection between Stoney and all of Hilton Head island, the cultural value of self-sufficiency, the importance of land ownership, and the relationship and continuation with the founders' original values and intentions for the community. Given the connection to the ancestors of the community, especially those that founded came to Hilton Head and Stoney Community, Criterion B could also be applied. Criterion B is association with the lives of persons significant in our past. Bulletin 38 again points out the meaning of "our" can describe the particular community and who is regarded as traditionally important. Stoney and Hilton Head reference the founders of the community who after pursuing freedom,

[91] Bulletin 38, 11.

established the settlement community for themselves, their children, and the rest of their descendants.

Though the questions focused more heavily on the topic of continued practice, the responses to each of those questions did also address the topic. For example, in Interview 1, the conversation moved towards the topic of fishing in the creeks in the neighborhood. During the conversation, the interviewer asked if people were still fishing in the community. Participant 1 responded that people still did, though it was less than it was when they were growing up. They explained that you simply cannot fish the same amount or in the same ways as before because the fishing regulations in the area have altered certain practices. In this circumstance, some of the historic fishing patterns may have changed over time, but the practice of fishing and the connection to the creeks has not necessarily changed over time.

Using the words and feelings expressed by the interviewees, there appears to be a strong integrity between the past and the present. As already summarized, each interview participant described the emotional bond that connects them to their ancestors' original mission in addition to a relationship with their more immediate ancestors like grandparents and great-grandparents. Furthermore, there is a stated connection to the culture of tomorrow with the expressed desire to maintain the community and culture with their children and future generations. Participant 2 called themselves a "keeper of this Gullah Geechee culture." After their mother passed away, they inherited everything she had, all of her belongings and all of her beliefs. With that they are "keeping the

Gullah culture alive on Hilton Head Island today." [92] Participant 3 said "Stoney now as it's being threatened with change and, actually, destruction, we have to remember that it weakens the entire culture, because when we lose one neighborhood, it weakens our culture because the culture has been always connected."

One of the conclusions from the survey of Stoney Community was that enough of the younger generations had moved away from the neighborhood and the island to have significantly altered the community's ability to continue the culture. As the report argued, the migration of the younger generation in the late 20th century made the transmission of traditional Gullah Geechee culture so difficult as to cause a rupture in the traditional community. The evidence provided for this conclusion is a quote from one of the community members who grew up in the neighborhood, moved away, then returned some years later. She said, "somewhere along the line, those traditions, kind of, skipped the generations." [93] However, this community member did return to Stoney and living there today. Skipping a generation implies traditions missed one generation but moved on to the next, not that the traditional culture had been severed between generations.

While not relying entirely on a community's definition of integrity, the TCP framework does prioritize it, and the questions appeared to determine a certain definition of integrity before the community members could provide that definition themselves. When the buildings may not necessarily communicate the significance of the community to the community members, it is difficult then to apply the standards of integrity to those

[92] Stoney Interview Participant 2, Interview with Velma Fann, New South Associates, November 6, 2020.
[93] New South Associates, "Research Study of the Historic Stoney Community," New South Associates Technical Report, 2010, 61.

buildings. Especially in those neighborhoods experiencing loss in the physical fabric of the neighborhood due to the long-term effects of the highway, the search for significance and integrity in the physical fabric affected by the structural highway damage is a potentially self-fulfilling cycle of a lack of integrity. These resources may not meet the seven standards of integrity as laid out in the NRHP, but the TCP framework provided in Bulletin 38 can recontextualize the standards to be more inclusive of properties that may otherwise not meet the criteria.

Phillips Community Interview

The study of the differences and the ultimate disconnect between the NRHP, Stoney Community, and the application of Bulletin 38 posed the question of how the interview and evaluation process could proceed differently in another Gullah Geechee community. The interview with Mr. Richard Habersham of Phillips Community served as an assessment of how the TCP criteria can be applied to another Gullah Geechee community following the analysis and findings from the Stoney interviews. One goal was to think about the kinds of questions that could have been posed to Stoney and could be posed to communities in the future. The second goal was to potentially draw parallels in the interview responses, with the intent of applying the TCP framework.

Interview Questions

The questions were formulated to understand how Mr. Habersham defines the significance of his community, its historic and present meaning and impact on the lives of those in the neighborhood. Because many of the questions from the Stoney interviews

seemed to be more narrowly focused from the onset, the priority in this conversation was to be as open-ended as possible. The interview questions in Stoney focused heavily on aspects of the built environment, seemingly as a way to communicate relationship of condition, without letting the participants arrive at that conclusion on their own. Rather than mining through the interview data to understand how the Stoney Community members may define significance and integrity, the goal with Mr. Habersham was to ask in a way wherein he provided that information explicitly. The initial conclusions from project 278 suggest the definitions of integrity of relationship and condition were determined through interview planning and questions rather than the answers.

Because of this, the questions to Mr. Habersham were to follow a community or, in this case, a person-based approach as suggested through the TCP framework. General questions about the history and the meaning behind the community were posed to understand how he views the significance of Phillips. Following that were several questions pertaining more broadly to the themes of integrity of relationship and condition. To reiterate, a property has integrity of relationship when it is considered important to the cultural group in order to sustain a belief or a cultural practice. Integrity of condition is essentially boiled down to the question of whether the members of the traditional culture believe the place in question is important and maintains its integrity, then the place has integrity. [94] Several of the Stoney Community questions, especially the question regarding change over the last 50 years, indicated a view that change had occurred and that the changes had affected the integrity of relationship and condition for

[94] Bulletin 38, 10.

the neighborhood. This concept in particular inspired two of the questions posed to Mr. Habersham, which dealt with how if at all the community had changed over the years, and if that change has affected the ways he feels about his community or the way he interacts with Phillips. Because community members in Stoney were not able to address this position during the interviews, it became a main topic in the conversation with Mr. Habersham. The full list of questions is located in Appendix C. Some of the questions and responses are transcribed and included or paraphrased below.

Interview Responses

Those questions, over a 55-minute phone call, managed to yield answers as to how Mr. Habersham defines the significance and integrity of his community. Large selections of quotations are included in the following section that provide clarity on Mr. Habersham's thoughts and feelings about Phillips. The following quotation mentions several key aspects of both significance and integrity and is included in full. After he had discussed the ways in which the community had changed since he was younger, the question of if those changes affect how he feels about Phillips, he had this in response:

> "No. No. No. I mean, change is gonna come. We know that. We have to realize now, when I grew up in the 60s, you couldn't get a decent job, you got the leftover jobs and stuff. Don't matter what kind of skin you had, you didn't get a decent job. People in the community, if they had a job, they had something else they did too. You call it a side hustle, a hobby, whatever, you had something else. My father worked at the navy yard, but he also had cows and pigs. So that brought in extra money to the family. Now today, you don't have to raise a lot of cows and pigs and things. You still got gardens in the community. But we don't need no large gardens no more because the people now can go out and get better paying jobs and they don't have to do that labor intensive stuff anymore. So when you've got more houses and everything, that means that the families still take an interest in the community and the community is still growing. And that's what this

> property was meant for. You have to realize when my great grandfather bought the property, that's why he used heirs property, didn't want one family member to own the property, they always wanted a place that their ancestors would always have no matter what. If you went out and did well in the world, that was all good and well. But if you went out and didn't do so good, you would have a place to come back to. So the property itself is still serving the same purpose. It's still serving that purpose of community and family. Even though it changed how we perceive it, it changed how we get there, but it's still serving the same purpose."

This question and response and particular harkened to the TCP definition of integrity in that Mr. Habersham explained the nature of the relationship to the existence of the community on the property. He emphasized the connection between himself and his ancestors, fulfilling their original vision of descendants living on the same property for generations. Through the changes on the land like the livestock or the extent of the farming, Mr. Habersham explained that the purpose of the property remained the same throughout time. The connection to ancestors and future generations is communicated through the land ownership and the ability for future generations to keep or return to the property over time.

Comparing the Interview Data

Many of his responses to the questions were similar to those answers in the Stoney interviews. One of the main themes from Stoney that also appeared throughout Mr. Habersham's interview was the connection to the ancestral nature of the community and the maintenance of their ancestor's plans for them. Because this theme was demonstrated in the interviews with Stoney Community members and is generally perceived as a characteristic of Gullah Geechee culture, the theme was expected to appear prior to the conversation. Both Mr. Habersham and the Stoney interviewees discussed the

ways in which the land and specifically the space for gardens and animals changed as time changed. Participant 3 mentioned that it "changed because people had another option to get cash." Mr. Habersham also mentioned the connection to the land and the water as economic opportunities, and his response was similar to the feelings from the Stoney Community member. The significance was not the physicality of the creeks, thought they were and are still enjoyed; the significance lay in the motivation and the pursuit of self-sufficiency rather than the physicality of the landscape.

Another crucial element mentioned in this interview is the acknowledgement that certain institutionalized disadvantages have also caused detrimental effects on the communities both through historical and modern planning. The choices that historically neglected the concerns of the community members still affect the community today and especially affect the current highway planning processes. The Director of the GGCHCC also brought up the same issue in her comment to the SCDOT, that the encroaching development had long affected the community. The report of the initial conclusions for Stoney Community, the firm attributed much of the physical loss in integrity through the loss of buildings and some properties to in-fill. Yet the discussion of the nature of cyclical loss from the highway stopped there. In other words, the report acknowledged the issue without addressing the structural nature that caused and then exacerbated physical loss over time.

None of the questions in the interviews acknowledged the structural nature of the effects of the highway, but rather focused more on the change itself. Though not explicitly, the Stoney Community member in interview 3 did allude to this issue.

Participant 3 stated "And when the bridge and the ferry boat first came, it was considered an eyesore because these were Gullah families living along the highway, and they wanted to disband that. And I remember back in the early 50s, just before the bridge came, they had proposed at the state legislature to zone the island so that they could have some restrictions on what happened at Stoney." The topic was also not posed explicitly to Mr. Habersham, however the question of what preservationists can do to better support Phillips and communities like Phillips. In response, Mr. Habersham said the following:

> "Just look at these communities. East of the Cooper (river). Look at the Phillips Community, 6 Mile, 4 Mile, 10 Mile, what we all got in common? When they built the roads, they built the roads straight through our communities. Snowden was a little bit different. Scanlonville a little different. Cause they built it on the edge. But the rest of the communities, they built the road right through our communities. That's a story all by itself. But now when they develop these new properties. What's the first thing they say. There's too much traffic. Okay well build the road through your community. You caused the problem. So when you're preserving, you have to look at the infrastructure and how they developed that too. Who got displaced. You ever notice in the 4 Mile community, where town center is at, you see all those business before town center. It was homes all the way through there."

In this response, he refers to that cycle of destruction brought on by highway construction. In not acknowledging the disadvantages of the discriminatory infrastructure, the interpretation of integrity and particularly physical integrity may result in a perspective defined by those limitations.

In reference to evaluating either community as a TCP, perhaps the most important criteria recognized in this analysis but not seen in the SCDOT consultation is the claim to both integrities of relationship and condition. Understanding integrity of relationship is vital to TCP eligibility in that the relationship between the culture and the place are tied

together. In other words, if the place is lost to the culture, the culture suffers. Integrity of both relationship and condition is put into jeopardy if the proposed highway expansions came to fruition and changed the property lines, the relationships from one property to another over a widened road, and ushered in a new era of new development. Interview participants in both cases expressed concerns over the potential changes and losses because the land, the lot patterns, land ownership, and particularly the transferal from generation to generation are vital to the preservation of the community and culture.

The interpretation of integrity, especially in relation to the integrity of condition is the difference between the two communities and evaluations. Continued practice from the immediate family members and generations through to the founding of the community and their ancestors vision for future generations. Because the survey in Stoney placed physical integrity of the built environment in many of the now non-extant features, the report quickly reached a conclusion of a lack of physical integrity. The condition of the physical space may rest more in the retention of land ownership, which is threatened by the highway expansion itself, and the ensuing cycle of encroaching development.

Insight from Tarpon Springs Greektown Historic District

Preservationists may be unfamiliar with the practice of approaching a property through the NRHP from a community based approach, but while the approach is relatively novel, it is not unsuccessful. The TCP historic district of Tarpon Springs Greektown in Florida is a prime example of how the community input informed the successful application of the NRHP to the property. Tarpon Springs Greektown Historic

District added to the NRHP in 2014, and it was the first listed TCP in Florida and the first non-indigenous TCP historic district. For background, the TCP is associated with the Greek American and maritime community, and it is the only Greek American community in the sponge industry. Tina Bucuvalas, the interviewer and the writer for the nomination, reflected on her experiences during the process. She is a folklorist, and interviewed many community members throughout the nomination process. During the nomination process, the idea of continuing value rather than continuing use guided the conversation, as some of the buildings still maintain value from their historic roles but are not currently used in their historic roles. [95]

Bucuvalas created a working group of current residents and community members who grew up in the district to discuss various aspects of the district. To create the boundary description of the district, that working group walked around the area and spoke about the history, the residents, and the structures that did and did not still exist. In doing the exercise, the community members pointed to a type of structure that was previously unknown to those writing the nomination. This process allowed the community members to define the boundaries of the district and the contributing sites, buildings, and structures. Through this method, the continued use and the continued value of the various elements in the community were based entirely on the uses and values of the community associated with the place. [96]

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[95] Tina Bucuvalas, "The Tarpon Springs Greektown Traditional Cultural District: The National Register Nomination and the Battle of the Sponge Docks," *Journal of American Folklore* 132, no. 526 (2019): 453-464. muse.jhu.edu/article/734367.
[96] Ibid., 465.

Bucuvalas explains that place-rooted development can preserve the buildings and structures in a district while also maintaining the cultural context, especially for those cultures from lower economic backgrounds like the fishermen or of varied racial and ethnic groups. Folklorists have the ability to document and interpret both tangible and intangible culture, and therefore have the ability to interpret traditional cultures and their properties through preservation standards of significance and integrity. Because there is little research and understanding of non-indigenous TCP listings, she argues a field dominated by historians, architectural historians, archaeologists, and cultural anthropologists could benefit from collaborating more with folklorists. [97]

The insights Bucuvalas provides from her time highlights the differences in the approaches to the respective surveys and nominations for Stoney Community and Tarpon Springs Greektown. She was also met with certain setbacks and institutional differences; the city planned to add playgrounds, additions to the dock area, and change the channels for the boats in the water upset the community members. The plans were in part motivated by the interests of merchants and tourists visiting the area rather than the interests of the community members. [98]

She stresses the importance of not only incorporating community involvement throughout the process but also beginning with community involvement. Working with community members directly was the "most crucial" part of the process, according to Bucuvalas. [99] In doing so, the project was able to define the boundaries of the district and

[97] Ibid., 470.
[98] Ibid., 467-468.
[99] Ibid., 470.

identify the important buildings, structures, and sites in addition to the storyscapes and cultural significance attached to those places. After those conversations, she could then apply the NRHP criteria using the TCP framework to the information the working group provided. Allowing the process to begin with and be defined by the community who holds attachment and meaning to a property opens the NRHP policies to the broader interpretation outlined in Bulletin 38. Whereas the initial report and conclusions from the Stoney Community survey did not follow this community-based process, the evaluative framework did prove successful in the most recent one of three listed TCPs in the Southeast.

CHAPTER SIX

CONCLUSION

As the two case studies in Hilton Head and Mount Pleasant show, there is a clear and present threat to the historic and cultural resources in Gullah Geechee communities due to the highway expansion projects that threaten to change or damage property lines and buildings and structures neat the road. Like these two examples, many Gullah Geechee communities in South Carolina and throughout the corridor were founded by freedmen after working and saving what they could for land purchase. They envisioned a future for the neighborhoods for their children and the descendants have managed to retain their land ownership and stake in the community, as well as a relationship with both their ancestors' vision and each other. These historic and living communities face a variety of threats through the ongoing growth and development.

The futures of Phillips Community and Stoney Community are relatively set in motion; Phillips Community is seeking a nomination for the NRHP and has the visibility and support of some community partners. [100] Hilton Head Island's website outlines the next few months for the Highway 278 project, including several meetings with the different groups associated with the SCDOT. [101] SCDOT hired the firm HDR to provide an independent engineering review of the SCDOT's Reasonable Alternatives. According to a 2019 report from *The Island Packet*, Hilton Head intends the land planner to create

[100] Paola Arruda, "Lowcountry groups work to preserve historic Phillips Commnity," *Live 5 WCDC,* Last updated February 2021, https://www.live5news.com/2021/02/11/local-groups-work-preserve-historic-phillips-community/.
[101] US 278 Gateway Corridor Improvements, *Town of Hilton Head Island,* https://www.hiltonheadislandsc.gov/projects/278corridor/.

options to memorialize the history for the families who will eventually have to leave; town council members suggested a monument, a park, or some other type of public meeting place. [102] Meetings between the SCDOT, HDR, and the land planner are set for April and May 2021. The next public meeting is scheduled for July 2021 and will discuss the preferred alternative design. [103] The future of Stoney Community and US Highway 278 will likely be determined by the end of 2021, but other Gullah Geechee communities may have different futures.

Even though Stoney Community has, among other avenues, explored a route to the NRHP, there are likely other communities seeking protection who would not wish to pursue the NRHP. As it stands, there is no set blueprint outlining how communities seeking to fortify themselves can take preventative measures from future or potential threats. Larger groups have been working to organize the network of Gullah Geechee communities throughout the corridor for that very reason of protecting the culture. The GGCHCC helps to provide more national visibility for the preservation of the culture, and educates communities through its newsletter. Some groups like the Center for Heirs' Property Preservation exist to organize communities from within to consolidate the legal documentation for their property ownership, among other services. [104] Other organizations and coalitions like The Gullah Society or The Gullah Geechee Sea Island

[102] Katheirne Kokal, "Historic Hilton Head neighborhood may be paved over by US 278. Will a land plan help?" *The Island Packet.* December 2019, https://www.islandpacket.com/news/politics-government/article247885255.html
[103] US 278 Gateway Corridor Improvements, *Town of Hilton Head Island*. The alternatives are listed on the SCDOT US 278 Corridor website here: https://www.scdot278corridor.com/alternatives.
[104] The Center for Heirs Property Preservation, https://www.heirsproperty.org/.

Coalition [105] Ultimately as the GGCHCC management plan addressed, the Gullah Geechee people resist the forces that threaten them, meaning within every community there are residents organizing to protect and sustain Gullah Geechee culture and resources. How communities can take preventative measures may be best answered by those Gullah Geechee individuals and organizations advocating for their futures every day, especially those advocating against the highway expansion and new development that does not prioritize the preservation of communities. Whether outside parties pay attention to those concerns before options for the future become more limited is another question entirely.

It is possible the threats facing these communities from highway expansion and new development spur greater interest or haste in fighting to preserve the Gullah Geechee historic resources. As Mr. Habersham pointed out in his interview, some of the other historic communities in Mount Pleasant like 4 Mile no longer exist. He stressed that proposed highway expansion plans could do to their community was it has done to others. As development slowly pushes out other communities, the calls to preserve the historical Gullah Geechee communities will continue to grow. Galvanizing support from community partners will hopefully continue to draw additional resources to these historic neighborhoods. Community partnerships in Phillips community with organizations like the Coastal Conservation League and local preservation groups provided additional support and visibility from their audiences.

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[105] The Gullah Society, http://www.thegullahsociety.com/.
Gullah Geechee Nation, The Gullah Geechee Sea Island Coalition,
https://gullahgeecheenation.com/gullahgeechee-sea-island-coalition/.

While organizations from multiple fields and a variety of backgrounds can contribute to supporting and protecting Gullah Geechee communities, historic preservation can also play a role in the protections through the NRHP listings and determinations of eligibility. Though Gullah Geechee places exist on the NRHP and the NPS has recognized the GGCHCC, Gullah Geechee resources are underrepresented on the NRHP. Recognition through the NRHP can provide opportunities to funding and resources for the preservation of a property in addition to the section 106 policies in place to manage certain threats. Considering how the NHPA and NEPA require certain due process in evaluating historic resources for federally funded projects, there can be some major benefit to a listing or eligibility status on the NRHP. Through the different policies and legal framework, there is a basis for preservation to try to advocate for and support Gullah Geechee historic resources through the NRHP. One way to do that is by utilizing TCPs to list some of the places that otherwise may not qualify under the original framework. TCPs were created through Bulletin 38 to provide a broader framework for applying the NRHP criteria in order to incorporate and accept those historic resources that while significant, do not necessarily conform to the standard criteria.

Despite the over 96,000 listings on the NRHP, only 57 of them total are TCPs. Why there are so few TCPs listed on the NRHP is a question that merits significant investigation. Through this research, only 57 listed properties could be found and recognized as TCPs, and almost 90% of those are associated with Native American tribes and communities. Outside of Bulletin 38 and the years of insightful writings from Thomas King, a deeper analysis of the listed TCPs and their nominations may yield a

more comprehensive understanding of how the TCP framework has been successfully applied. An investigation into those listed properties and their available nomination forms could provide some insight into the definitions of significance and integrity that guided their eligibility. Furthermore, an investigation into the perspective of those at the NRHP evaluating the properties could explain how and why the listing process for TCPs seems so elusive. Potentially the larger issue reflected in the lack of TCPs over the last 30 years could be the cyclical nature of hesitation and lack of use.

The gap in the application or rather the successful listing of TCPs could be due to the hesitation present in preservationists writing nominations, SHPOs, the NRHP, or more likely, a combination of all three. Perhaps the biggest obstacle is the obscure way the NRHP incorporates TCPs. Even if preservationists as a whole included the TCP framework into their future nominations, there must also be an expressed acceptance and encouragement for the TCP criteria from the NRHP and the NPS. The challenge in positioning a property as a TCP to the NRHP is the lack of explicit reference to the concept in the nomination process. The requirements for a TCP are already outlined in Bulletin 38, so additional documents detailing the concept and its requirements is not necessary. Listings could incorporate the phrase "traditional cultural property' into the name as some listings already do, but creates a superficial bridge between the standard NRHP and TCP concepts. It also creates a separate description on par with "Historic District" that often appears in the listing title, but Historic District also has the benefit of maintaining its own category of property.

Creating an additional field on nomination forms may be both the simplest option and the most difficult to achieve. Given the bureaucratic nature of the NRHP under the NPS under the Department of the Interior, a change to the form rarely amended may be an uphill battle. However, creating an additional and optional field that identifies whether a property is a TCP could provide clarity to a currently obscure process. The significance and integrity of the property could still be communicated through the same format on the form, but the explicit identification of the property as a TCP would alert both those filling out the form and those reading the form of the incorporation of the different evaluative framework. The additional field if checked would also make the search for TCPs much simpler. Rather than relying on insider information or scouring every nomination form for the mention of TCPs, the additional field could make TCPs searchable both through the NRHP online database and the downloadable excel spreadsheet. A clear option for the concept could communicate the message that the NRHP is actively accepting and potentially encouraging the use of it. However, until that possibility becomes a reality, preservationists must instead reference the concepts outlined in Bulletin 38 and clearly communicate them throughout the evaluations and nominations.

Before arriving at a nomination, however, preservationists must be able to consider and evaluate a property while incorporating the TCP concept in its entirety, beginning with the perspectives of the community and culture associated with a property. Not only significance but integrity must begin from the perspective of the community before being applied to the NRHP criteria rather than the other way around. Integrity of relationship and condition in particular emphasize the need to derive the definitions from

community perspective, especially when reconciling the NRHP aspects of integrity with a property that has experienced loss of physical integrity.

Both the case of Stoney and Phillips indicate a clear path for evaluating integrity within Gullah Geechee communities and resources. An analysis of interviews from Stoney Community members revealed how they define significance and the integrity of their community. Though not every Gullah place is the same, certain elements from these two case studies connect the histories, histories, and values from one community to another. Elements of Mr. Habersham's experiences and the broader experiences of the community echo the same issues brought up in Stoney Community.

One big, key example in this study was the understanding that preservationists and the NRHP may interpret the weight of the physical change in a community differently than the community does. Asking a question about how a community has changed insinuates that 1) the community has changed and 2) the changes are important to the integrity of the place and to the people. Those changes could be important to a community, but not necessarily so. The framework for TCPs as outlined in Bulletin 38 explains how to approach the topic of integrity not through the original seven aspects, but through the more conceptually based relationship and condition. Such was the case with Stoney in which the conclusions drawn may not have adequately taken into account the considerations of integrity for TCPs.

The difference in the NRHP and the communities' perspectives on change highlights the need to incorporate a community-based approach when surveying a property as a TCP. As Bucuvalas reflected on her experience nominating and listing the

Tarpon Springs TCP, the input from the community group was foundational and invaluable to the creation of the district significance, boundaries, and contributing properties. The same process should be incorporated into any future considerations of Gullah Geechee communities as TCPs. Analyzing interviews with community members helped to derive community-based definitions of integrity of relationship and condition, so the same process can be achieved at the start of a project rather than after.

Integrity of condition is communicated in these communities through the desire to retain land ownership and sovereignty of the community, which would deteriorate and potentially lost through the long-term effects of the highway expansion. NRHP recognition of the significance and integrity of Gullah Geechee communities and properties like Stoney and Phillips who are advocating for recognition can be a powerful tool for the preservation of the historic and living communities. The search for significance and integrity in the physical fabric of a property affected by the structural highway damage is a potentially self-fulfilling cycle of a lack of integrity, however TCPs can potentially change the interpretation of Gullah Geechee communities through the NRHP criteria. The potential to characterize both of these Gullah Geechee communities in South Carolina as TCPs through the representations of their broad patterns of history, connection to significant persons in the community's past, and through their demonstrated integrity of relationship and condition, begs the question of how TCP eligibility can apply to other Gullah Geechee communities and impact the future of Gullah Geechee properties on the NRHP.

APPENDICES

Appendix A

Traditional Cultural Properties Lists

State, Territory, District	Number of Listed Sites	Number of TCPs
Alabama	1330	0
Alaska	437	1
American Samoa	31	1
Arizona	1486	4
Arkansas	2,761	0
California	2905	10
Colorado	1599	0
Connecticut	1640	0
Delaware	717	0
District of Columbia	655	0
Florida	1850	2
Georgia	2175	1
Guam	129	0
Hawaii	366	0
Idaho	1062	1
Illinois	1916	0
Indiana	2011	0
Iowa	2426	0
Kansas	1540	0
Kentucky	3480	0
Louisiana	1488	1
Maine	1656	0
Maryland	1583	0
Massachusetts	4416	1
Michigan	1961	2
Minnesota	1738	2
Mississippi	1483	0

State, Territory, District	Number of Listed Sites	Number of TCPs
Missouri	2408	0
Montana	1223	3
Nebraska	1135	1
Nevada	386	5
New Hampshire	804	0
New Jersey	1764	0
New Mexico	1187	4
New York	6238	2
North Carolina	3051	0
North Dakota	461	0
Northern Mariana Islands	38	0
Ohio	4100	0
Oklahoma	1366	3
Oregon	2075	0
Pennsylvania	3501	0
Puerto Rico	360	0
Rhode Island	809	0
South Carolina	1615	0
South Dakota	1374	2
Tennessee	2181	0
Texas	3416	0
Utah	1875	1
Vermont	872	0
Virginia	3266	0
Washington	1614	7
West Virginia	1075	0
Wisconsin	2524	1
Wyoming	568	2
U.S. Minor Outlying Islands	2	0
U.S. Virgin Islands	91	0

Figure A-1: List of total NRHP listings and TCPs.

Name	State	Native American Affiliation	Other Group Affiliation
X'unaxi	Alaska	Y	
Turtle & Shark	American Samoa	Y	
I'itoi Mo'o (Montezuma's Head) and 'Oks Daha (Old Woman Sitting)	Arizona	Y	
Gold Strike Canyon (Nevada)/Sugarloaf Mountain (Arizona) (border)	Arizona	Y	
Pascua Cultural Plaza	Arizona	Y	
Chi' chil Bildagoteel Historic District (Oak Flat)	Arizona	Y	
Coso Hot Springs	California	Y	
Helkau Historic District	California	Y	
De-No-To Cultural District	California	Y	
Wiipuk uun'yaw Trail (Desert Path)	California	Y	
Tishawnik	California	Y	
Tahquitz Canyon	California	Y	
Soda Rock (Ch'ichu'yam-bam)	California	Y	
Mus-yeh-sait-neh Village and Cultural landscape Property	California	Y	
Luiseno Ancestral Origin Landscape	California	Y	
Kuchamaa (Tecate Peak)	California	Y	
Tarpon Springs Greektown	Florida	N	Greek Immigrant Community
Council Oak Tree Site on the Hollywood Seminole Indian Reservation	Florida	Y	
New Echota in Calhoun County	Georgia	Y	
Yawwinma	Idaho	Y	
St. Augustine Catholic Church and Cemetery	Louisiana	N	Cane River Creole People

Name	State	Native American Affiliation	Other Group Affiliation
Turners Falls Sacred Ceremonial Hill Site	Massachusetts	Y	
Minog	Michigan	Y	
Rice Bay	Michigan	Y	
Ma-ka Yu-so-ta (Boiling Springs);	Minnesota	Y	
Oȟéyawe--Pilot Knob (Oheyawahi)	Minnesota	Y	
Annashisee Iisaxpuatahcheeaashisee (Medicine Wheel on the Big Horn River)	Montana	Y	
Sleeping Buffalo Rock	Montana	Y	
Medicine Tree Site	Montana	Y	
Pahuk	Nebraska	Y	
Gold Strike Canyon/Sugarloaf Mountain (border)	Nevada	Y	
Spirit Mountain	Nevada	Y	
Cave Rock (de 'ek wadapush)	Nevada	Y	
It-goom-mum teh-weh-weh ush-shah-ish	Nevada	Y	
Toquima Cave	Nevada	Y	
El Cerro Tome Site	New Mexico	N	Catholic, Christian, Latino
Rio Grande and Sand Bar areas of the Pueblo of Sandia	New Mexico	Y	
Zuni Salt Lake and Sanctuary	New Mexico	Y	
Tortugas Pueblo Fiesta of Our Lady of Guadalupe	New Mexico	Y	Latino
Our Lady of Mount Carmel Grotto	New York	N	Roman Catholic; Italian American
Bohemian Hall and Park	New York	N	Czech American
Medicine Bluffs	Oklahoma	Y	

Name	State	Native American Affiliation	Other Group Affiliation
White Eagle Park	Oklahoma	Y	
Bassett Grove Ceremonial Grounds	Oklahoma	Y	
Inyan Kara Mountain	South Dakota	Y	
Bear Butte	South Dakota	Y	
Rainbow Bridge	Utah	Y	
Tamanowas Rock	Washington	Y	
Old Man House Site	Washington	Y	
Doe-Kag-Wats	Washington	Y	
Saint Mary's Mission TCP Historic District	Washington	Y	
Lawetlat'la (Mt. St. Helens)	Washington	Y	
Grave of the Legendary Giantess	Washington	Y	
Snoqualmie Falls	Washington	Y	
Black Hawk Powwow Grounds	Wisconsin	Y	
Medicine Wheel--Medicine Mountain	Wyoming	Y	
Green River Drift Trail Traditional Cultural Property	Wyoming	N	Ranch, farm, homestead culture
Tonnachau Mountain	Federated States of Micronesia	Y	

Figure A-2 Lists the known TCP listings by state, territory, or district, in addition to its cultural association.

Appendix B

Graphs and Tables of Stoney Interview Data

50-60 Years Ago

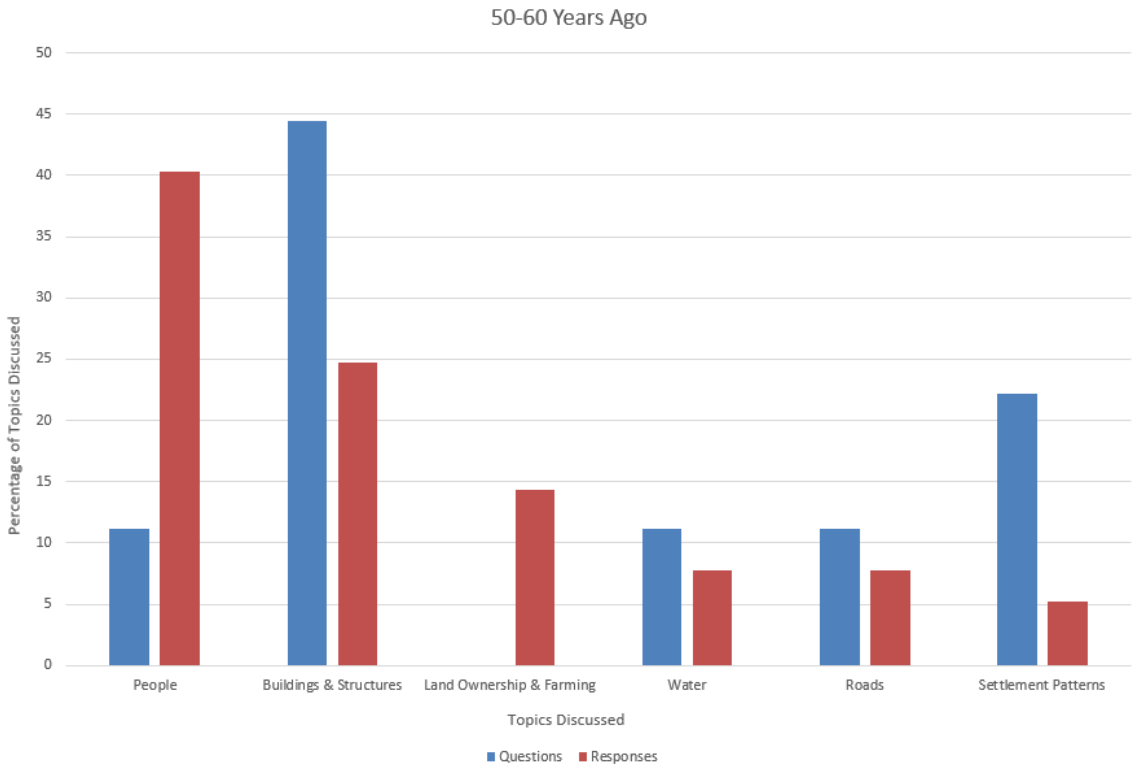

Figure B-1 shows the percentages of topics discussed following the "50-60 years ago" question.

Broad History

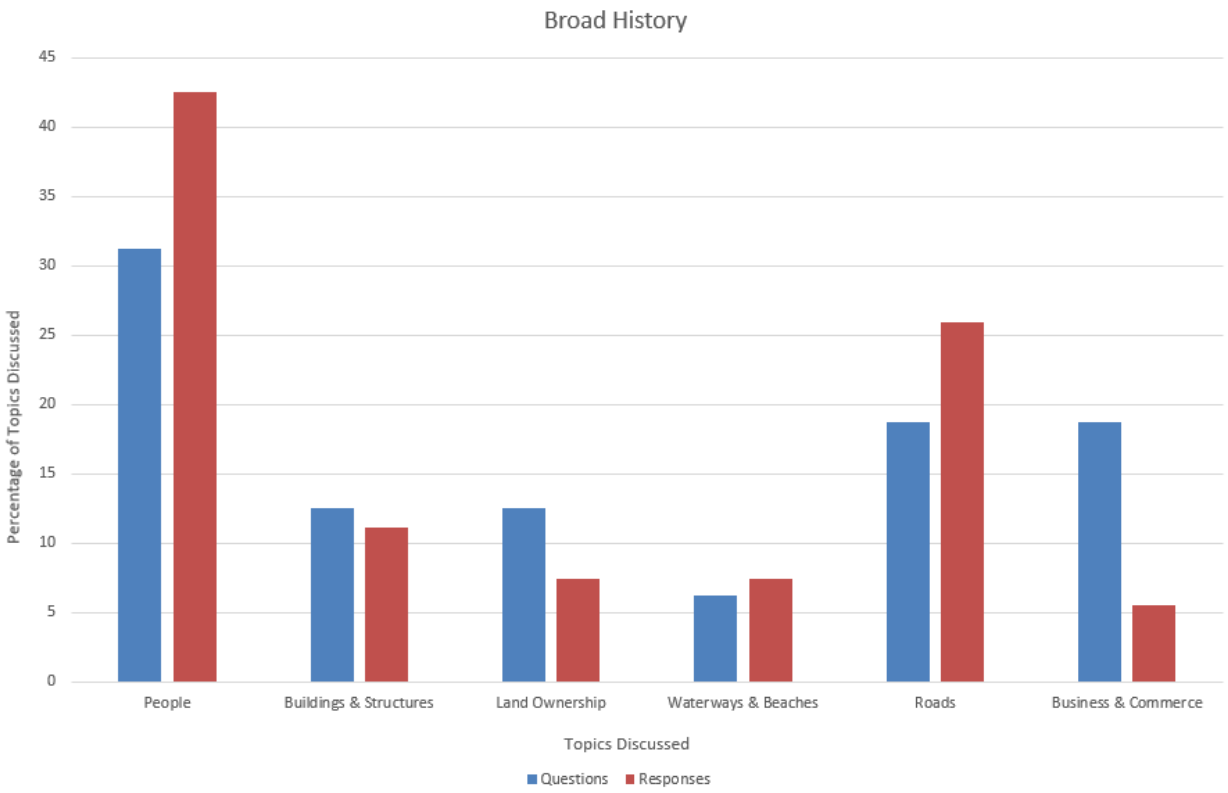

Figure B-2 shows the percentages of topics discussed with “broad history” questions.

Location, Boundary, Setting

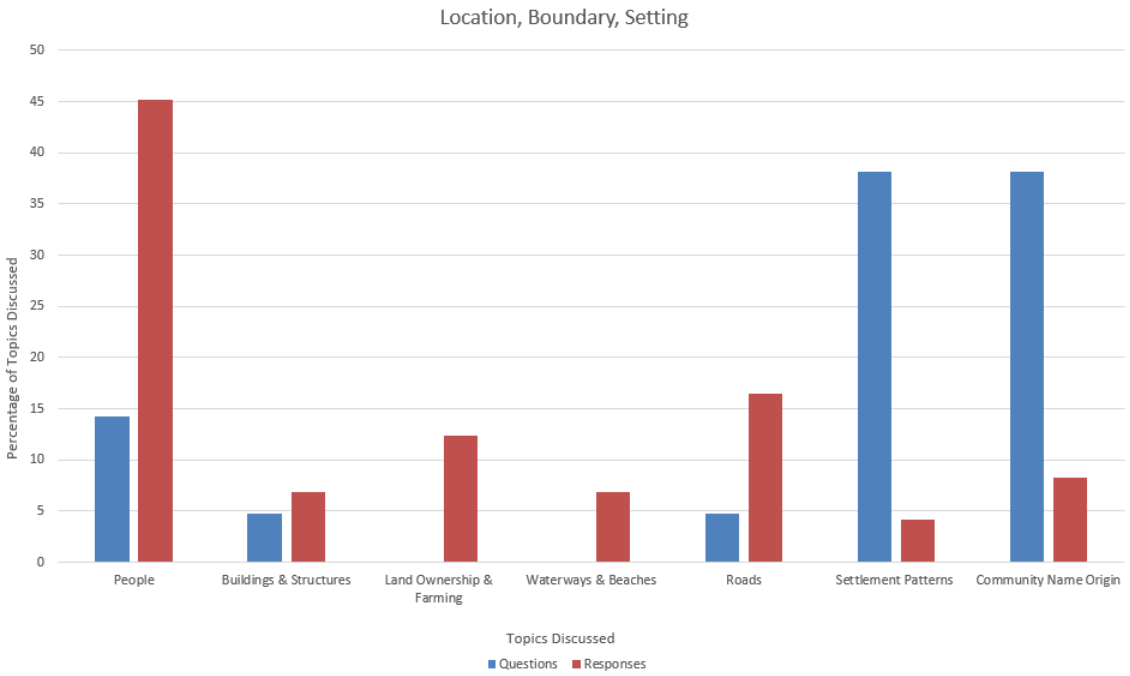

Figure B-3 shows the percentages of topics discussed with “location, boundary, setting” questions.

Specific Places

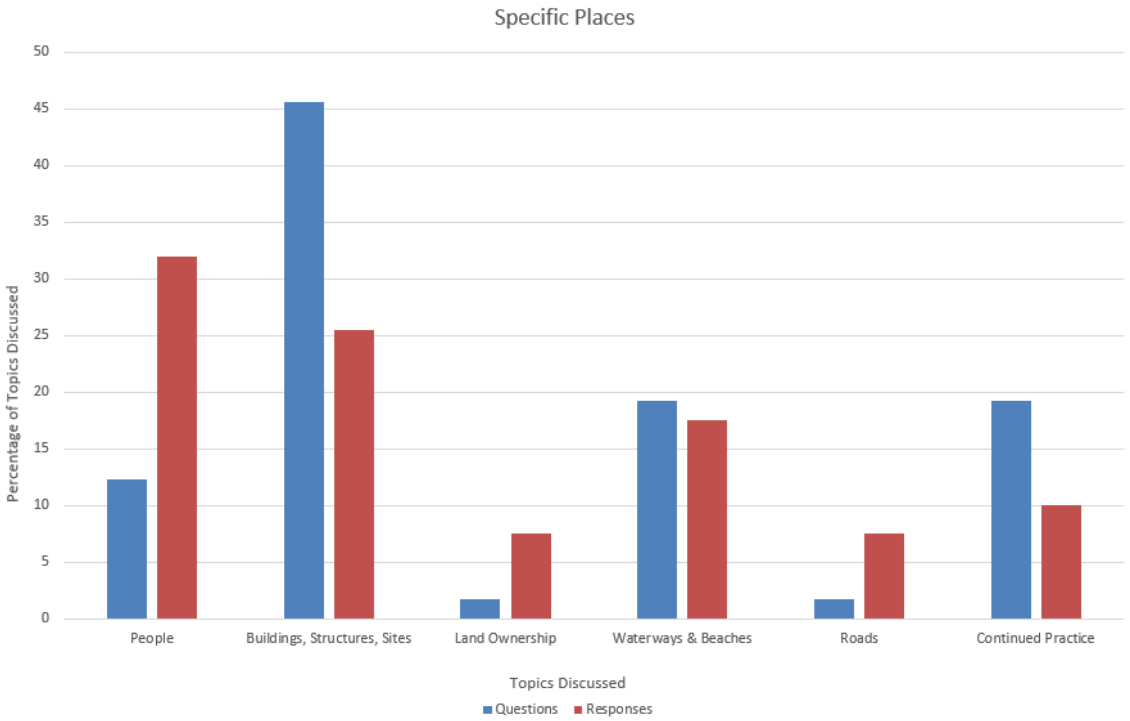

Figure B-4 shows the percentages of topics discussed with questions about specific places.

Community Meaning & Connection

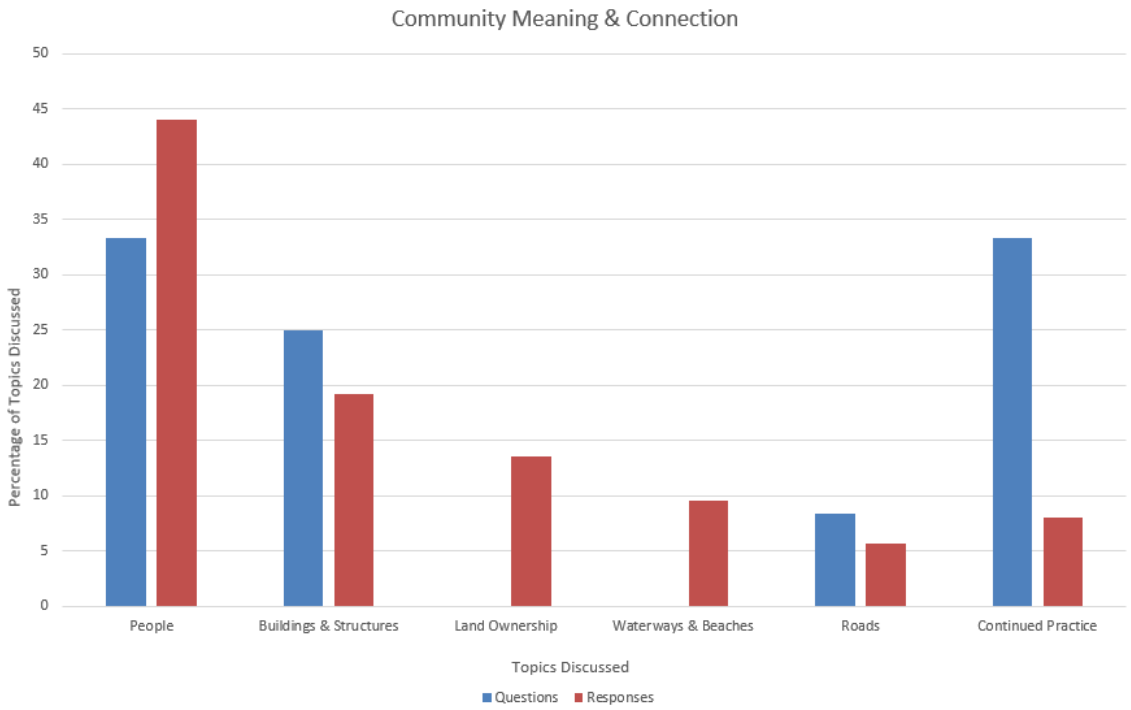

Figure B-5 shows the percentages of topics discussed with questions about community meaning & connection.

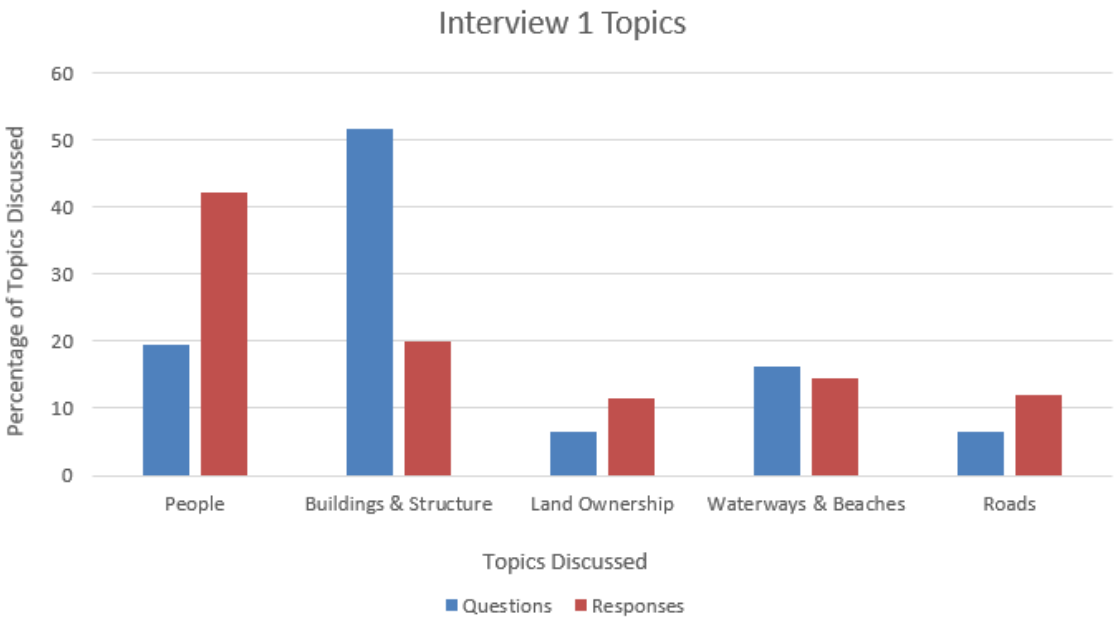

Figure 5.6 shows the percentages of topics discussed in Interview 1.

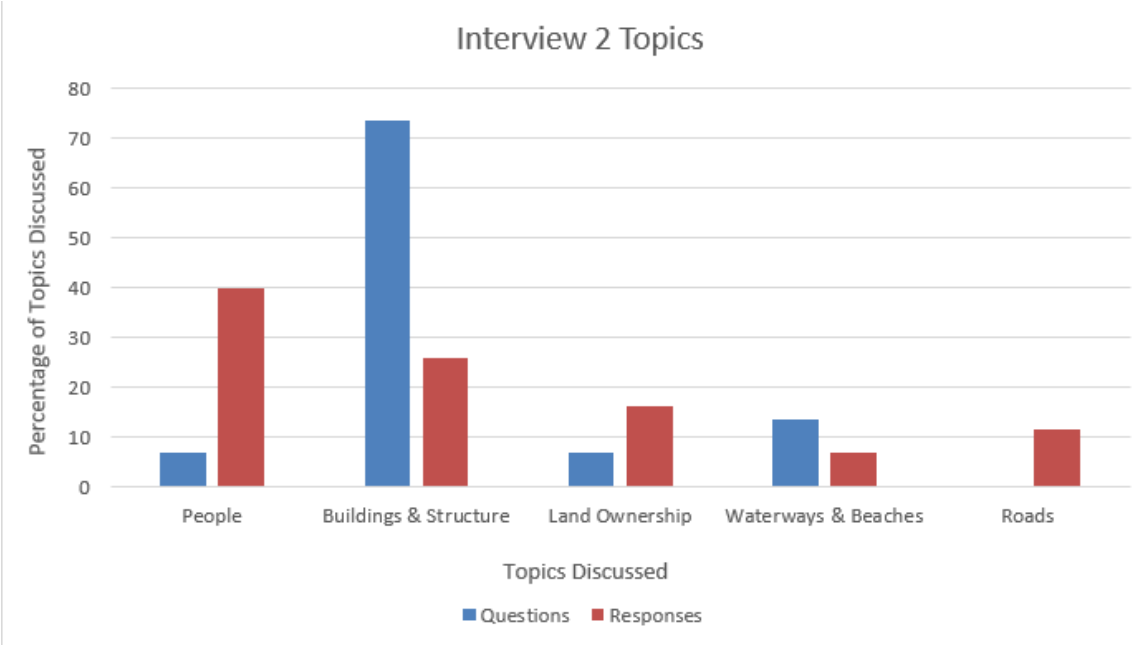

Figure B-7 shows the percentages of topics discussed in Interview 2.

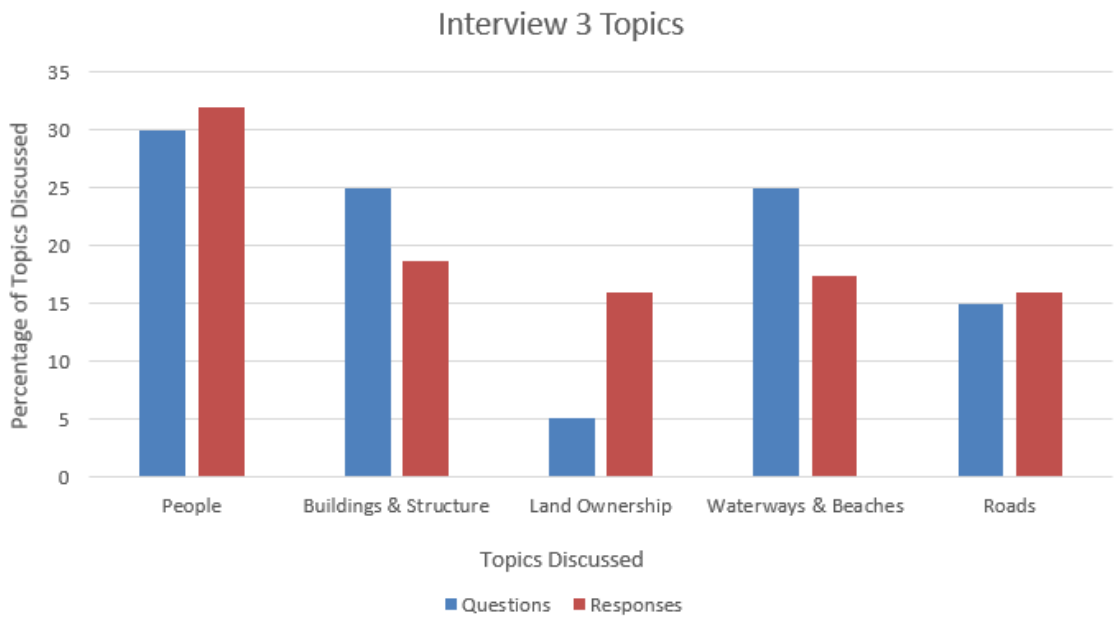

Figure B-8 shows the percentages of topics discussed in Interview 3.

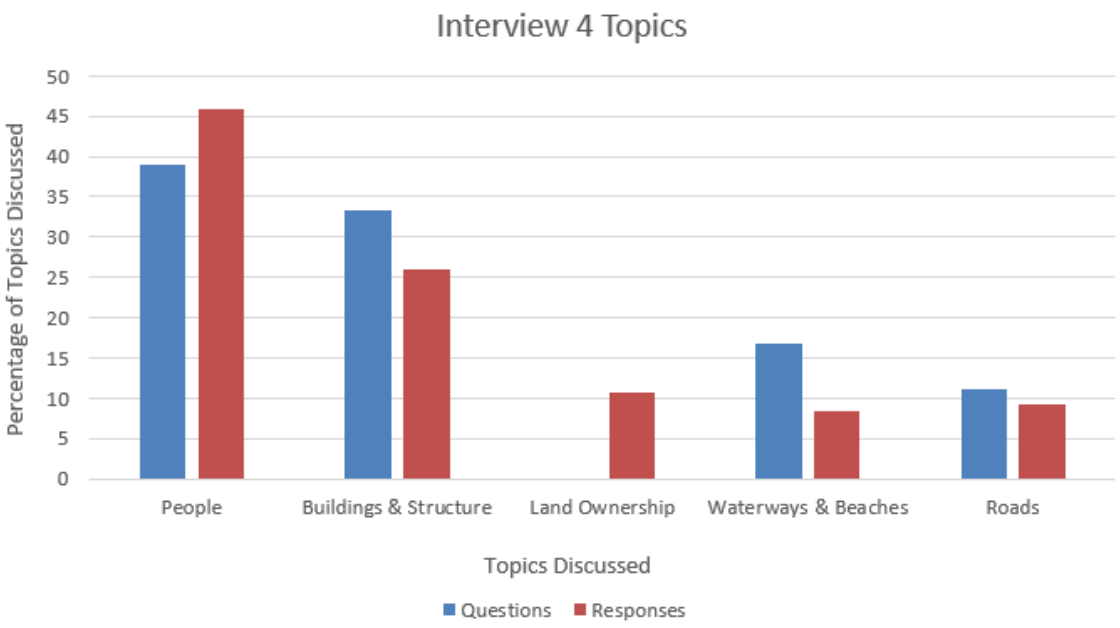

Figure B-9 shows the percentages of topics discussed in Interview 4.

Participant 1	
Word	Frequency
people	57
stoney	26
family/families	24
area	19
boat(s)	17
hilton head	16
store	16
island	15
years	13
land	12
fish	11
building	9
creek	9
still	9
road	8
baskets	7
oyster	6
book	6
owned	6
highway	6
property	6

Participant 2	
Word	Frequency
land	32
hilton head	25
house(s)	23
store	22
people	21
island	16
road	12
community	11
gullah	11
children	10
school	9
water	9
building	8
family	8
stoney	8
creek	7
owned	6
built	6
boat	6
name	6
area	6
money	6

Participant 3	
Word	Frequency
neighborhood(s)	22
people	20
stoney	19
church(es)	17
important	11
now	10
beach	9
family/families	9
horse	9
service	9
plantation	8
land	7
walk	7
same	6
culture	5
everybody	5
gullah	5
prayer	5

Participant 4	
Word	Frequency
stoney	60
area	32
people	30
family	22
still	21
grandfather	18
store(s)	18
years	14
now	13
hilton head	11
value	9
community	8
church	6
fishing	6
grocery	6
lane	6
women	6
business	5
christmas	5
education	5
home	5
men	5
road	5
school	5

Figure B-10 shows the most frequently spoken words in participants' responses after stopwords and common words were removed.

Appendix C

Questions to Mr. Habersham

- Can you tell us a bit about yourself and your relationship to Phillips?
- If a history teacher wanted to teach a section on South Carolina or local history and they asked you to share information about Phillips, what would you share with those students?
- How would you describe your community to the youngest generation?
- What does Phillips mean to you? What communicates that meaning to you and to others?
- Has the appearance of the community changed since you were younger? If it has, is that important to you and how you experience it now?
- Does that change how you feel about Phillips, from when you were younger to now?
- What was and is Phillips' relationship with other neighborhoods in Mount Pleasant?
- Those buildings from the different time periods, do they have any kind of impact on you when you're walking around your neighborhood or driving around, do they have any kind of impact or is less about the buildings?
- A lot of those stories, I feel like what they go back to is the people who lived there
- From reading the news and talking with the state historic preservation office, I know you've worked with people in historic preservation, history, the different organizations like historic Charleston foundation or preservation society, what have those experiences been like for you?
- Are there things you think folks in preservation should be more aware of, things we should be doing better?
- I know you have to leave - do you want to say any final words?

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